

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

In re POLYURETHANE FOAM ANTITRUST
LITIGATION

This document relates to:

ALL INDIRECT PURCHASER CASES

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)
) MDL Docket No. 2196
) Index No. 10-MD-2196 (JZ)
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**INDIRECT PURCHASER PLAINTIFFS' MOTION FOR APPROVAL OF THEIR
FORM OF CLASS NOTICE AND NOTICE PLAN, AND TO SET A FINAL
APPROVAL HEARING ON THE SETTLEMENT WITH DOMFOAM AND VALLE**

Pursuant to Rule 23 and this Court's April 9, 2014, Class Certification Memorandum Opinion and Order [Doc. # 1102], and its Order dated April 16, 2014 [Doc. # 1117] granting Plaintiffs' motion for class certification, Indirect Purchaser Plaintiffs ("IPPs") move this Court to approve the forms of Notice to be disseminated to the Class and to approve the Notice Plan. In addition, pursuant to this Court's Order dated March 26, 2012 [Doc. #355], Indirect Purchaser Plaintiffs ("IPPs") request that those notices also include notice of the settlement entered into between IPPs and Domfoam and Valle Foam, the setting of dates for opting out and/or objecting to the settlement, and for the scheduling of a final approval hearing on that settlement.

In support of their motion, Plaintiffs rely upon their proposed Long Form Notice (Exhibit A), their proposed Short Form Summary Notice for publication (Exhibit B), the Declaration of Anya Verkhovskaya with Notice Plan attached thereto (Exhibit C), and Plaintiffs' accompanying memorandum filed contemporaneously with this Motion.

For the Court's consideration, Plaintiffs attach a proposed Order In Connection with Notice and Notice of Settlement (Exhibit D).

Dated: April 16, 2014

Respectfully submitted,

/s/ Marvin A. Miller

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Andrew Szot

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Counsel for Indirect Purchaser Plaintiffs

CERTIFICATE OF SERVICE

I, Marvin A. Miller, certify that on April 16, 2014, I caused to be served the foregoing document in accordance with Paragraph 9 of the Initial Case Management Order entered January 20, 2011.

/s/ Marvin A. Miller

EXHIBIT A

LONG FORM NOTICE

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

_____)	
In re POLYURETHANE FOAM ANTITRUST)	
LITIGATION)	
_____)	MDL Docket No. 2196
)	Index No. 10-MD-2196 (JZ)
This document relates to:)	
)	
ALL INDIRECT PURCHASER CASES)	
_____)	

**NOTICE OF PENDENCY OF CLASS ACTION
AND NOTICE IN CONNECTION WITH SETTLEMENT**

**If You Purchased Carpet Cushion, Bedding, or Upholstered Furniture Containing
Polyurethane Foam, A Class Action Lawsuit May Affect Your Rights.**

A court authorized this notice. You are not being sued.

You could be affected by a class action lawsuit alleging that producers of polyurethane foam conspired to raise the prices of polyurethane foam products. **Please read this Notice Carefully.**

Are You Affected? If you purchased carpet cushion, bedding, or upholstered furniture containing foam made by The Carpenter Company, Crest Foam Industries, Inc., Domfoam International, Inc., Flexible Foam Products, Inc., FXI-Foamex Innovations, Inc., Future Foam, Inc., Hickory Springs Manufacturing Co., Mohawk Industries, Inc., Ohio Decorative Products, Inc., Leggett & Platt Inc., Scottdel Inc., Valle Foam Industries, Inc., Vitafoam Products Canada Limited, Vitafoam, Inc., Woodbridge Foam Corporation, Woodbridge Sales & Engineering, Inc., or Woodbridge Foam Fabricating, Inc.,¹ in Alabama, Arizona, California, Colorado, the District of Columbia, Florida, Hawaii, Illinois, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Dakota, Tennessee, Vermont, West Virginia, or Wisconsin, during the period January 1, 1999 to the present, then you may be affected by a pending lawsuit that has been certified as a class action. You are included in the class even if the foam was incorporated into a product made by a company other than one of the Defendants. These companies produce most of the polyurethane foam sold in this country.

¹ These corporations, along with Louis Carson and David Carson, are the Defendants in the lawsuit.

What is the Nature of this Lawsuit? The lawsuit is called *In re Polyurethane Foam Antitrust Litigation*, Index No. 10-MD-2196 (JZ) and is pending in the United States District Court for the Northern District of Ohio in Toledo. In its Class Certification Memorandum Opinion and Order dated April 9, 2014, and its Order dated April 16, 2014, the Court decided that this lawsuit could proceed as a class action on behalf of a group of people and entities (the "Class") that may include you.

No Decision on Merits of Case. Nothing in this Notice, or the Court's order granting class certification expresses any opinion by the Court as to the merits of the claims or defenses asserted by either party in the litigation. Instead, the Court has ordered issuance of this notice to provide the class with important information so you may make an informed decision regarding your legal rights in connection with this litigation.

What is this Case About? This lawsuit was brought as a class action on behalf of all persons and entities who indirectly purchased polyurethane foam produced by the Defendants in the form of carpet cushion, bedding products such as pillows and mattresses, and upholstered furniture from January 1, 1999 to the present, alleging that the Defendants conspired to keep prices of polyurethane foam they produced higher than if the Defendants had not conspired. The Defendants, except for Vitafoam, Domfoam International Inc. ("Domfoam"), Valle Foam Industries (1995) Inc. ("Valle") deny that they did anything wrong. Vitafoam has admitted its participation in the alleged conspiracy, but seeks to avoid paying damages to the class on other grounds. Domfoam and Valle have entered into a preliminary settlement with Plaintiffs (see below). The Court has not yet decided whether the Class Plaintiffs or Defendants are correct. If this case goes to trial, the lawyers for the Class will have to prove their claims.

Background of Litigation. Plaintiffs' [Corrected Second Amended Consolidated Class Action Complaint] alleges that the Defendants engaged in a long running conspiracy to artificially inflate the cost of polyurethane foam used in carpet cushion, bedding products, and upholstered furniture. Plaintiffs contend that Defendants actions violated antitrust and consumer protection laws in the states of Alabama, Arizona, California, Colorado, the District of Columbia, Florida, Hawaii, Illinois, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Dakota, Tennessee, Vermont, West Virginia, and Wisconsin. The parties have vigorously litigated the suit for several years, including many motions and an interlocutory appeal. Further information may be obtained by examining the court files at the Clerk's Office of the United States District Court for the Northern District of Ohio, by contacting Class Counsel, or visiting the website mentioned below.

Domfoam/Valle Settlement. On January 3, 2012, Domfoam, Valle and A-Z Sponge & Foam Products Ltd, a subsidiary, and their respective officers, and key personnel, entered into a proposed settlement with Plaintiffs. On March 26, 2012, the Court entered an Order preliminarily approving the settlement. Because Domfoam and Valle were in bankruptcy, the settlement provides that Domfoam and Valle will not include any monetary payment but they will provide to Plaintiffs substantial assistance in the form of producing evidentiary support to help Plaintiffs prosecute their claims through trial. Such assistance will be in the form of

declarations, affidavits, deposition and trial testimony. At this time, Domfoam and Valle have substantially complied with their agreement. **The Court has scheduled a final approval hearing on this settlement for _____, 2014.**

Who is a Member of the Class? The Class has been defined as:

All persons or entities in Alabama, Arizona, California, Colorado, [the] District of Columbia, Florida, Hawaii, Illinois, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Dakota, Tennessee, Vermont, West Virginia, and Wisconsin who purchased products containing flexible polyurethane foam ["product" here defined to include only carpet underlay, bedding, and upholstered furniture products], not for resale, which were manufactured, produced or supplied by Defendants or their unnamed co-conspirators from January 1, 1999 to the present. Excluded from the Class are governmental entities, Defendants, their co-conspirators and their representatives, parents, subsidiaries and affiliates.

Your Legal Rights and Options in this Lawsuit. The Court has ordered that you be sent notice now because you have to decide whether to stay in the Class, or whether to remove yourself from the Class. **You have to decide not later than the time by which the Notice Administrator is to receive any Exclusion Request as set forth below.**

This notice summarizes your rights and options at this time. More information is available at the website below. If you are included in the Class, you will need to decide whether to: (1) stay in the class or (2) ask to be excluded from the class.

To stay in the class, you do not need to do anything at this time. If you do not want to participate in this lawsuit, you may opt out of the class, and request to exclude yourself.

Right to Object and Appear. If you are a member of the Class, and you have not requested to exclude yourself, you have a right to object to the final approval of the Domfoam/Valle settlement. To do so, you must file a written objection with Class Counsel and the Court at the addresses listed below to be received not later than _____, 2014. **Your written objection must include:**

- Your name, address, telephone number, and a detailed explanation of the basis for your objection;
- The case name and number: *In re Polyurethane Foam Antitrust Litigation*, Index No. 10-MD-2196 (JZ); and
- You must also include the product you purchased, when you purchased it and you must include all documentation relating to the purchase.

Class Counsel

Marvin A. Miller
Miller Law LLC
115 S. LaSalle Street, Suite 2910
Chicago, IL 60603

Court

Clerk of the Court
U.S. District Court
Northern District of Ohio
United States Courthouse
1716 Spielbusch Avenue
Toledo, OH 43604

You have a right to appear at the final approval hearing and may be heard by the Court. You can appear in person or by counsel. If you intend to appear, then must notify Class Counsel and the Court in writing of your intent so do so. **Such notification must be received by Class Counsel and the Court at the addresses listed above not later than _____, 2014.**

Opting Out. You have the legal right to opt out of this class action and/or the Domfoam/Valle settlement. If you choose to exercise your right to opt out of the Class, you will not be bound by any court orders, jury verdicts or settlements approved by the Court, but you keep your right to sue or otherwise resolve your claims with Defendants on your own, but you cannot make a claim against any amounts that may be recovered by the Class from Defendants in a settlement or as a result of a judgment, if any. To opt out of the Class or the Domfoam/Valle settlement, you must mail a letter or postcard that says you want to be excluded from the Class in *In re Polyurethane Foam Antitrust Litigation (Indirect Purchaser Cases)*, and include your name, address, telephone number and signature. **You must mail your Exclusion Request so that it is received by the Notice Administrator no later than.... [DATE]**at the following address:

In re Polyurethane Foam Antitrust Litigation

Exclusions

**3410 West Hopkins Street
PO Box 170500
Milwaukee, WI 53217**

Staying in the Class. To stay in the Class, you do not need to do anything at this time. If you stay in the Class and do not opt out, you will give up the right to file your own lawsuit or seek any other form of resolution of claims you may have against Defendants, and you will be legally bound by all court orders, judgments, or settlements approved by the Court, but if money or benefits are obtained as a result of a settlement or judgment in the lawsuit, you may be entitled to damages. You will not be able to sue, or continue to sue Defendant as part of any other lawsuit for any overcharges relating to price fixing in the polyurethane foam industry during the

specified time frames. If money or benefits are obtained, you will be notified about how to make a claim to participate and request a share of any funds or benefits created for the Class.

Who Represents You? The Court appointed Marvin A. Miller of Miller Law LLC, 115 S. LaSalle Street, Suite 2910, Chicago, IL 60603, as "Class Counsel" to represent you. You don't have to pay Class Counsel or anyone else to participate. Instead, if Class Counsel recovers money or benefits for the Class, they will ask the Court for an award of attorneys' fees and costs, which may either be deducted from any money recovered for the Class or paid by Defendants. You may hire your own lawyer to appear in Court for you, but if you do, you are responsible for paying that lawyer.

Trial. The Court has scheduled a trial for October 15, 2014. The trial will not be against Valle or Domfoam because they have settled as described above. The case will proceed against the remaining Defendants.

How Can I Get More Information? If you have questions or want a detailed information or other documents about this lawsuit and your rights, go to [website] or call [insert].

EXHIBIT B

SHORT FORM NOTICE

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

In re POLYURETHANE FOAM ANTITRUST
LITIGATION

MDL Docket No. 2196
Index No. 10-MD-2196 (JZ)

This document relates to:

ALL INDIRECT PURCHASER CASES

**NOTICE OF PENDENCY OF CLASS ACTION
AND NOTICE IN CONNECTION WITH SETTLEMENT**

If You Purchased Carpet Cushion, Bedding, or Upholstered Furniture Containing Polyurethane Foam, A Class Action Lawsuit May Affect Your Rights.

A lawsuit called *In re Polyurethane Foam Antitrust Litigation*, Index No. 10-MD-2196 (JZ) is pending in the United States District Court for the Northern District of Ohio in Toledo alleging that producers of polyurethane foam conspired to raise the prices of polyurethane foam products. On April 9, 2014, and by Order dated April 16, 2014, the Court decided that this lawsuit could proceed as a class action on behalf of a group of people and entities that may include you. Nothing in this Notice, or the Court's order granting class certification expresses any opinion by the Court as to the merits of the claims or defenses asserted by either party in the litigation. Instead, the Court has ordered issuance of this notice to provide the class with important information so you may make an informed decision regarding your legal.

Plaintiffs' allege that the Defendants engaged in a long running conspiracy to artificially inflate the cost of polyurethane foam used in carpet cushion, bedding products, and upholstered furniture. Plaintiffs contend that Defendants actions violated antitrust and consumer protection laws in the states of AL, AZ, CA, CO, DC, FL, HI, IL, IA, KS, ME, MA, MI, MN, MS, MO, NE, NV, NH, NM, NY, NC, ND, OR, RI, SD, TN, VT, WV, and WI. The parties have vigorously litigated the suit for several years, including many motions and an interlocutory appeal. Defendants other than Vitafoam, Valle, and Domfoam deny the allegations. Valle and Domfoam have entered into a proposed settlement with Plaintiff. The Court has appointed Marvin A. Miller of Miller Law LLC to represent the Class. The lawyers for the Class will have to prove their claims with the remaining Defendants at a trial set to begin on [Date].

Are You Affected?

If you purchased carpet cushion, bedding, or upholstered furniture containing foam, not for resale, made by The Carpenter Company, Crest Foam Industries, Inc., Domfoam International, Inc., Flexible Foam Products, Inc., FXI-Foamex Innovations, Inc., Future Foam, Inc., Hickory Springs Manufacturing Co., Mohawk Industries, Inc., Ohio Decorative Products, Inc., Leggett & Platt Inc., Scottdel Inc., Valle Foam Industries, Inc., Vitafoam Products Canada Limited, Vitafoam, Inc., Woodbridge Foam Corporation, Woodbridge Sales & Engineering, Inc., or Woodbridge Foam Fabricating, Inc., in the states listed above during the period January 1, 1999 to the present, then you may be affected by a pending lawsuit that has been certified as a class action. You are included in the class even if the foam was incorporated into a product made by a company other than one of the Defendants.

Your Legal Rights and Options in this Lawsuit and the Settlement.

If you are included in the Class, you will need to decide whether to: (1) stay in the class or (2) ask to be excluded from the class. To stay in the class, you do not need to do anything at this time. If you do not want to participate in this lawsuit or the settlement by certain Defendants, you may opt out of the Class, and request to exclude yourself. If you exclude yourself you will not be bound by any court orders, jury verdicts or settlements approved by the Court, but you keep your right to sue or otherwise resolve your claims with Defendants on your own, but you cannot make a claim against any amounts that may be recovered by the class from Defendants in a settlement or as a result of a judgment, if any. **Requests to Exclude must be in writing and received by [Date].**

The Court will hold a hearing on [Date], at [Time] to consider whether to approve the proposed settlement with Valle and Domfoam. If you stay in the Class, you may object or comment on the settlement by [Date]. You or your own lawyer may also ask to appear and speak at the hearing at your own cost.

If you have questions or want a detailed notice or other documents about this lawsuit and your rights, go to [website] or call [insert].

EXHIBIT C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN RE: POLYURETHANE FOAM ANTITRUST)	
LITIGATION)	MDL No. 2196
)	
THIS DOCUMENT RELATES TO:)	Hon. Jack Zouhary
INDIRECT PURCHASER ACTIONS)	
)	
)	

DECLARATION OF ANYA VERKHOVSKAYA

I, Anya Verkhovskaya, declare as follows:

1. I am a Partner and Chief Operating Officer with A.B. Data, Ltd. (“A.B. Data”). My principal corporate responsibility is the day-to-day management of A.B. Data’s Class Action Administration Company, headquartered in Milwaukee, Wisconsin. A.B. Data provides a full range of class action and complex litigation support services and specializes in multifaceted class action-related project management as well as class action notice, claims, and settlement fund administration.

2. My business address is 600 A.B. Data Drive, Milwaukee, Wisconsin 53217, and my direct telephone number is 414-961-6441. My Curriculum Vitae is annexed hereto as **Exhibit A**.

3. I submit this declaration (the “Declaration”) at the request of Plaintiffs' counsel in the above-referenced matter (the “Action”).

4. This Declaration is based upon my personal knowledge and information provided to me by Plaintiffs' counsel, my associates, and staff. My opinions in this Declaration are based upon my knowledge, experience, and expertise.

MY BACKGROUND AND QUALIFICATIONS

5. I am a notice expert and have acted as Notice and Project Director in over 500 consumer, antitrust, wage and hour, employment, securities, ERISA, civil rights, discrimination, and other class action administrations. I have over 14 years experience administering class actions.

6. High profile cases wherein is where I effectuated successful notice campaigns include the following: *Desai v. ADT Security Services, Inc.* (\$15 million settlement); *Perez v. Rent-A-Center, Inc.* (\$109 million settlement); *Wyatt v. El Paso Corporation* (\$285 million settlement); *In re Symbol Technologies, Inc. Securities Litigation* (\$139 million settlement); *In re Lernout & Hauspie Securities Litigation* (\$120.5 million settlement); *In re Reliant Securities Litigation* (\$75 million settlement); *In re Ready-Mixed Concrete Antitrust Litigation* (\$50 million settlement); *In re Marsh ERISA Litigation* (\$35 million settlement); and *Carlson v. State of Alaska, Commercial Fisheries Entry Commission* (\$33.5 million settlement).

7. I have testified as an expert at trial, by deposition, or by providing an expert opinion in the following cases, including, but not limited to:

- a. *Estate of Gary Robertson v. ADS Alliance Data Systems, Inc.*, Case No. 8:11-cv-1652-T-33TBM, United States District Court, Middle District of Florida, Tampa Division;
- b. *Donaca v. Dish Network, L.L.C.*, Civil Action No. 11-cv-2910-RBJ-KLM, United States District Court for the District of Colorado¹;
- c. *Kalow & Springut, LLP v. Commence Corporation*, Civil Action No. 07-3442, United States District Court for the District of New Jersey; and

¹ This case involves claims brought under the Telephone Consumer Protection Act, 47 U.S.C. § 227.

d. *Hazelton v. Sonic Automotive, Inc.*, Case No. 02-12274, Circuit Court for the Thirteenth Judicial Circuit, Hillsborough County, Florida.

8. Additionally, I have developed and implemented notice plans in numerous antitrust cases, including, but not limited: *In re: Marine Hose Antitrust Litigation*, 08-MDL-1888, United States District Court, Southern District of Florida; *Ace Marine Rigging v. Virginia Harbor Services, Inc.*, SACV11-00436, United States District Court, Central District of California; and *In re: Iowa Ready-Mix Concrete Antitrust Litigation*, 5:10-CV004038-MWB, United State District Court, Northern District of Iowa.

9. I further oversaw other notice programs, all of which were court-approved, including but not limited to: *Bauman v. Superior Financial Corporation*, Civ. Action No. 4-01-CV-00756 GH, United States District Court, Eastern District of Arkansas Western Division; *In re Visionamerica, Inc. Securities Litigation*, Master File No. 3-00-0279, United States District Court, Middle District of Tennessee, Nashville Division; *In re Andrx Corporation, Inc. & Taztia XT Securities Litigation*, Case No. 02-60410-CIV-UNGARO-BENAGES, United States District Court, Southern District of Florida; *In re Supervalu, Inc. Securities Litigation*, Civil Action No. 02-CV-1738 (JNE/JGL), United States District Court, District of Minnesota; *Stockholders v. Rayovac Corporation*, Civil Action No. 02-Cv-0308, United States District Court for the Western District of Wisconsin; *In re: Tyson Foods, Inc. Securities Litigation*, Civil Action No. 01-425-SLR, United States District Court, District of Delaware; *Rupp v. Thompson*, File No. C5-03-347, State of Minnesota District Court, County of Lyon, Fifth Judicial District; *In re Pacific Gateway, Inc., Securities Litigation*, Master File No. C-00-1211-PJH, United States District Court, Northern District of California; *In re: Nx Networks Securities Litigation*, Case No. 00-CV-11850 (JLT), United States District Court, District of Massachusetts; *In re International*

Business Machines Corp. Securities Litigation, Civ. No. 1:05-cv-6279-AKH, United States District Court, Southern District of New York; *In re Viisage Technology, Inc. Securities Litigation*, Civil Action No. 05-cv-10438-MLW, United States District Court, District of Massachusetts; *Adams v. Crown Auto Dealerships, Inc.*, Case No. 8:04-CV-0323-T-27-MSS, United States District Court, Middle District of Florida, Tampa Division; *Martin v. Foster Wheeler Energy Corporation*, Civil Action No. 3:06-CV-0878, United States District Court, Middle District of Pennsylvania; *In re Bisys Securities Litigation*, Civil Action No. 04-CV-3840 (JSR), United States District Court, Southern District of New York; *In re Motive, Inc. Securities Litigation*, Civil Action No. A-05-CV-923-LY and *Adair v. Motive*, Case No. A-06-CA-017-LY, United States District Court, Western District of Texas; *In re Reliant Securities Litigation*, Civil Action No. H-02-1810 (Consolidated), United States District Court, Southern District of Texas, Houston Division; *In re Renaissancere Holdings Ltd. Securities Litigation*, Master File No. 1:05-CV-06764-WHP, United States District Court, Southern District of New York; *In re Suprema Specialties Securities Litigation*, Master File No. 02-168 (WHW), United States District Court, District of New Jersey; *In re: CP Ships Ltd. Securities Litigation*, Case No. 8:05-MD-1656-T-27 TBM, United States District Court, Middle District of Florida; *Mantzouris v. Scarritt Motor Group*, Case No. 8:03-CV-0015-T-30-MSS, United States District Court, Middle District of Florida, Tampa Division; *Croxall v. Courtesy Group*, Case No. 03-6201, Circuit Court for the Thirteenth Judicial Circuit in and for Hillsborough County, Florida, Civil Division; *Cotton v. Ferman Management Services Corporation et al.*, Case No. 02-08115, Circuit Court for the Thirteenth Judicial Circuit, Hillsborough County, Florida, Civil Division; *FW Transportation, Inc. v. Associates Commercial Corporation*, Case No. C200000084, District Court of Johnson County, Texas, 18th Judicial District; *Hess v. Oriole Homes Corporation*, Case No. CA 02-

13794-AA, Circuit Court of the Fifteenth Judicial Circuit, Palm Beach County, Florida; *Family Open MRI, Incorporated, as Assignee of Martha Pulido v. Direct General Insurance Company*, Civ. Action No. 03-4175, Div. G, Tampa, Hillsborough County, Florida; *Hill v. American Medical Security Life Insurance Company and Taxpayers Network, Inc.*, Civ. Action No. W-06 CA 322, United States District Court, Western District of Texas, Waco Division; *Parker v. American Medical Security Group and United Wisconsin Life Insurance Company*, No. 04-1-1980-42, Superior Court of Cobb County, State of Georgia; *Fray-Witzer v. Metropolitan Antiques, LLC*, Civil Action No. 02-5827, Superior Court Department of the Trial Court, Suffolk Division, Business Litigation Session; *In re Vonage Initial Public Offering (IPO) Securities Litigation*, Docket No. 07-CV-177 (FLW/LHG), United States District Court, District of New Jersey; *Yingling v. eBay, Inc.*, No. C-09-01733 JW (PVT), United States District Court, Northern District of California, San Jose Division; *In re Enterprise Wage and Hour Employment Practices Litigation*, MDL No. 2056, United States District Court, Western District of Pennsylvania; *Milford & Ford Associates, Inc. v. Cell-Tek, LLC*, C.A. No. 1:09-CV-11261-DPW, United States District Court, District of Massachusetts; *Sokoloski v. Stewart Title Guaranty Company*, Case No. 3:08 cv 236 (AWT), United States District Court, District of Connecticut; *In re RBC Dain Rauscher Overtime Litigation*, Master File: 06-03093 JRT-FLN, United States Court, District of Minnesota; *Fray-Witzer v. Olde Stone Land Survey Company*, C.A. No. 2008-04175, Commonwealth of Massachusetts, Superior Court; *Black v. Metso et al.*, 3:05-CV-1951, United States District Court, Middle District of Pennsylvania; *Ramirez v. Greenpoint Mortgage Funding, Inc.*, Case No. 08-CV-00369 TEH, United States District Court, Northern District of California; *Pereira v. Footlocker, Inc.*, Civil Action No. 07-CV-2157-JCJ, United States District Court, Eastern District of Pennsylvania; *Valuepoint Partners, Inc. v. ICN Pharmaceuticals, Inc.*,

Case No. SACV 03-989 DOC (ANx), United States District Court, Central District of California; *Overby v. Tyco International Ltd.*, Case No. 02-CV-1357-B, United States District Court, District of New Hampshire; *In re Take-Two Interactive Securities Litigation*, No. 1:06-cv-00803-RJS, United States District Court, Southern District of New York; *Mayer v. Administrative Committee of the Smurfit-Stone Container Corporation Retirement Plans*, Case No. 1:09-cv-02984, United States District Court, Northern District of Illinois; *D Michael Collins and Milford & Ford Associates, Inc. v. ACS, Inc.*, Civil Action No. 1:10-CV-11912-RGS, United States District Court, District of Massachusetts.

10. I served as one of the principal Notice Administrators in the *In re Holocaust Victim Assets Litigation*, United States Eastern District of New York, Case No. CV-96-4849, Phase I and Phase III (“HVAP”), with a settlement amount of 1.2 billion dollars. A.B. Data designed, analyzed, and implemented notice, document management systems, and/or claims administration and processing in the matter. As a court-appointed notice administrator, A.B. Data played a key role in the worldwide Phase I Notice that resulted in collection of more than 500,000 initial questionnaires. In Phase III, A.B. Data delivered notice to over 10,000 Jewish communities in 109 countries, and administered international help and call centers. In Phase I and Phase III, A.B. Data’s staff personally assisted more than 100,000 potential claimants with completion of the initial questionnaires and claim forms. A.B. Data was in charge of the claims management process and the submission of all claims.

11. More recently, in February 2011, I was appointed the Administrative Director of Project HEART (Holocaust Era Asset Restitution Taskforce) to spearhead all efforts to provide the essential tools, strategy, and information that will ultimately enable the Government of Israel and its partners to secure a measure of justice for eligible Jewish victims and their heirs.

12. Since February 2011, Project HEART has become one of the most comprehensive multilingual notice campaigns ever undertaken, covering 137 countries and including the use of paid media, earned media, direct-mail notice, internet notice, organizational outreach, targeted outreach, as well as a video message displayed every half hour on the electronic billboard over Times Square in New York.

13. In total, I have served as a class action notice, settlement, and/or fund administrator in cases totaling more than \$2 billion in settlement distribution.

14. A.B. Data's headquarters are located in Milwaukee, Wisconsin, where the company has multiple facilities. Detailed information about A.B. Data and its services is annexed hereto as **Exhibit B**.

15. Founded in 1980, A.B. Data has earned an international reputation for expertly managing the complexities of class action administration. A.B. Data's work in all aspects of class action administration has been perfected by decades of experience.

16. A.B. Data is an industry leader in full-service class action notice and settlement administration. Our notice programs are known worldwide for their efficiency, effectiveness, affordability, and compliance with Rule 23 of the Federal Rule of Civil Procedures and due process requirements. We are a recognized expert in carrying out customized notice programs in a cost-efficient manner that substantially improves the efficacy of these programs.

NOTICE OF CLASS CERTIFICATION

17. Based on my knowledge of this case, it is my understanding that the Notice of Class Certification in this Action will include the following components:

- a. Media notice;
- b. Website; and

c. Call center.

18. In this Declaration, I will describe each component of the proposed notice program, provide recommendations, and issue an expert opinion as to the adequacy of this Notice of Pendency to meet Rule 23 of the Federal Rules of Civil Procedures and due process requirements.

MEDIA NOTICE

19. Media notice in this Action will include paid, targeted media placement that leverages both traditional print media and online (Internet) media. A.B. Data has a long-standing and well-established network of media and publishing contacts as well as an experienced, dedicated media experts and media placement specialist.

20. Our media expert and media placement specialist, Linda V. Young, is Vice President of Media with A.B. Data's Class Action Administration Company. Ms. Young is responsible for the development and implementation of media/publication notice plans, media placements, and expert affidavits. She has extensive industry experience in media planning and execution as well as in market research and analysis and in working closely with public relations professionals and firms. Her specific qualifications include the following:

21. Prior to joining A.B. Data, Ms. Young served as the Principal of Mile Marker Zero, LLC, a full-service marketing and advertising consulting firm. Mile Marker Zero's largest client was Complete Claims Solutions, a class action settlement firm in Florida that administered the first (*In re Lorazepam and Clorazepate Antitrust Litigation*) and many other pharmaceutical antitrust settlements.

22. During the six years that Ms. Young worked with CCS, she developed and implemented national notice programs involving print and earned media, as well as innovative and nontraditional methods, in many class action settlements.

23. Ms. Young has over 20 years of marketing, advertising, and media planning experience, managing advertising for such brands as Denny's and Coca-Cola.

24. Ms. Young's expertise, together with A.B. Data's institutional expertise and capabilities, enables A.B. Data to orchestrate precise placements within the requisite timeline for any given case economically.

25. Detailed media plan is attached as **Exhibit C**.

WEBSITE

26. A.B. Data will publish a case-specific website and generate strategic search engine placements and rankings, implement, host, and maintain this website. Class Members will have access to relevant case information, case updates, key documents, and applicable deadlines.

27. The official case-specific website will be easy to navigate and will contain detailed information and features, including, but not limited to the following:

- a. Downloadable Notice of Class Certification;
- b. Case updates;
- c. Background information about the case;
- d. Contact information;
- e. Court documents;
- f. Links to important information;
- g. Other key documents;

- h. Site promotion through registration with search engines;
- i. 24-hour monitoring and support; and
- j. Detailed traffic reporting.

CALL CENTER

28. A.B. Data will establish and maintain a case-specific toll-free telephone number to support this administration, using (1) live operators (customer service representatives, or “CSRs”) during normal business hours and (2) interactive voice response (IVR) technology on a 24/7 basis, with callers having the option during normal business hours to speak with a CSR.

29. Call center will provide the following services:

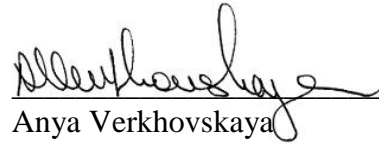
- a. Inbound toll-free telephone line;
- b. Call script developed using input from our experts and approved by Counsel;
- c. Call center representatives (available during business hours) who are trained regarding specifics of the case;
- d. Calls will be answered within 20 seconds during business hours;
- e. Messages that are received after business hours will be returned the following business day; and
- f. Detailed reporting.

CONCLUSION

30. It is my concluding opinion that, based on the attached media plan's reach and frequency analysis and other notice services discussed in this Declaration, this notice program will meet due process requirements.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signed this 15th day of April 2014.



Anya Verkhovskaya

EXHIBIT A

CURRICULUM VITAE OF ANYA VERKHOVSKAYA

ANYA VERKHOVSKAYA

CURRICULUM VITAE

Partner and Chief Operating Officer
A.B. Data, Ltd.

Phone: 414-961-6441

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anya.verkhovskaya@abdata.com

Anya Verkhovskaya is a Partner and Chief Operating Officer of the Class Action Administration Company of A.B. Data, Ltd. (“A.B. Data”). A.B. Data, founded in 1980, is an international firm that offers a full range of class action and complex litigation support services, with offices in New York, New York; Washington, D.C.; Chicago, Illinois; West Palm Beach, Florida; San Francisco, California; and Milwaukee, Wisconsin. Ms. Verkhovskaya oversees all aspects of A.B. Data’s class action administration and complex projects, and leads a team of legal, finance, information systems, information technology, claims administration, administrative, facilities, and operations professionals. A.B. Data is the fastest-growing company in the class action administration industry, with more than \$2.5 billion of settlements currently in various stages of management.

Ms. Verkhovskaya has extensive experience administering class actions and effectuating certification and settlement notice to various groups in the United States of America and abroad. Ms. Verkhovskaya also regularly provides expert opinions and live testimony concerning notice adequacy, class certification, and settlement issues in connection with a variety of class actions.

Specifically, Ms. Verkhovskaya has directed notice and/or settlement administration in hundreds of securities, ERISA, consumer, insurance, employment, wage and hour, human rights, environmental, antitrust, and other types of class actions including, but not limited to, the following cases:

- *Martin v. aaiPharma, Inc.*, Case No. 7:04-CV-27-D, United States District Court, Eastern District of North Carolina
- *Mulhern v. Macleod*, Civil Action No. 2005-01619, Commonwealth of Massachusetts
- *Franco v. Ace Parking Management, Inc.*, Case No. BC 392809, Superior Court of the State of California, Los Angeles County
- *In re ACS Shareholders Litigation*, Master File No. 3:06-CV-1592-M, United States District Court, Northern District of Texas, Dallas Division

- *Vishva Desai and Philip J. Charvat, on behalf of themselves and others similarly situated v. ADT Security Services, Inc.*, Case No. 1:11-CV-1925, United States District Court, Northern District of Illinois
- *In re AIG ERISA Litigation*, Case No. 04-CV-9387-JES(AJP), United States District Court, Southern District of New York
- *In re: AirGate PCS, Inc. Securities Litigation*, Civil Action No. 1:02-CV-1291-JOF, United States District Court, Northern District of Georgia, Atlanta Division
- *Akins, et al., v. Worley Catastrophe Response, LLC, Worley Catastrophe Services, LLC, and Michael Allen Worley*, Civil Action No. 2:12-cv-2401 CJB-SS, United States District Court, Eastern District of Louisiana
- *Carlson v. State of Alaska, Commercial Fisheries Entry Commission*, Case No. 3AN-84-5790 CI, Superior Court for the State of Alaska, Third Judicial District at Anchorage
- *Alakayak v. All Alaskan Seafoods, Inc.*, Case No. 3AN-95-4676 CIV, In the Superior Court for the State of Alaska, Third Judicial District at Anchorage
- *Shane et al. v. Edge et al.*, Case No. 3:10-CV-50089, United States District Court for the Northern District of Illinois, Northern Division
- *In re American Italian Pasta Company Securities Litigation (AIPC Settlement)*, 05-CV-0725-W-ODS, United States District Court for the Western District of Missouri, Western Division
- *Parker v. American Medical Security Group, Inc.*, Civil Action File No. 04-1-1980-42, In the Superior Court of Cobb County, State of Georgia
- *Hill v. American Medical Security Life Insurance Company*, Case No. W-06 CA 332, United States District Court, Western District of Texas, Waco Division
- *Puritan Budget Plan, Inc. v. Amstar Insurance Company*, Case No. 04-10428 CACE 09, In the Circuit Court of the 17th Judicial Circuit in and for Broward County, Florida
- *In re: Andrx Corporation, Inc., Taztia™ XT Securities Litigation*, Case No. 02-60410-CIV-UNGARO-BENAGES, United States District Court, Southern District of Florida
- *FW Transportation, Inc. v. Associates Commercial Corporation*, Case No. C200000084, District Court of Johnson County, Texas, 18th Judicial District
- *Cerda v. Associates First Capital Corporation*, Civil Action No. M-03-146, United States District Court, Southern District of Texas, McAllen Division

- *In re Atlas Energy, Inc. Shareholders Litigation*, Consolidated C.A. No. 5990-VCL, Court of Chancery, State of Delaware
- *S. Parker Hardware Mfg. Corp. v. AT&T Corp.*, Docket No. BER-L-162-06, Superior Court of New Jersey, Bergen County
- *Yarviv v. AT&T Corp.*, Docket No. SOM-L-272-05, Superior Court of New Jersey, Law Division: Somerset County
- *Hamilton v. ATX Services, Inc.*, Case No. 08-0030-CV-W-SOW, United States District Court for the Western District of Missouri, Western Division
- *Open MRI of Pinellas, Inc. v. Atlanta Casualty Insurance Company*, Case No. 03-7721, Circuit Court of the 13th Judicial Circuit in and for Hillsborough County, Florida
- *Arias v. Award Homes, Inc.*, Case No. M54183, Superior Court of California, County of Monterey
- *Patel v. Baluchi's Indian Restaurant*, Case No. 08-cv-9985 (RJS), United States District Court, Southern District of New York
- *In re Beazer Homes USA, Inc. ERISA Litigation*, Civil Action No. 1:07-CV-00952-RWS, United States District Court for the Northern District of Georgia, Atlanta Division
- *In re Beckman Coulter, Inc. Securities Litigation*, No. 10-1327-JST, United States District Court, Central District of California
- *Estate of Hampton v. Beverly Enterprises-Arkansas, Inc.*, No. CV 2004-95-3, Circuit Court of Bradley County, Arkansas
- *In re BigBand Networks, Inc. Securities Litigation*, Master File No. 07-CV-5101 SBA, United States District Court, Northern District of California, Oakland Division
- *Bragg v. Bill Heard Chevrolet, Inc. – Plant City*, Case No. 8:02-cv-609-T-30EAJ, In the United States District Court, Middle District of Florida, Tampa Division
- *Securities and Exchange Commission v. The BISYS Group, Inc.*, Civil Action No. 07-cv-04010-KMK, United States District Court, Southern District of New York
- *In re BISYS Securities Litigation*, Civil Action No. 04-CV-3840 (LAK), United States District Court, Southern District of New York
- *Von Friewalde v. Boeing Aerospace Operations, Inc.*, C.A. No. SA06CA0236-OG, United States District Court for the Western District of Texas, San Antonio Division

- *In re BP Prudhoe Bay Royalty Trust Securities Litigation*, Case No. C06-1505 MJP, United States District Court, Western District of Washington at Seattle
- *Wenger v. Brunswick Buick Pontiac GMC, Inc.* and *Soden v. East Brunswick Buick Pontiac GMC*, Docket Nos. L-2510-03 and L-5617-03, Superior Court of New Jersey, Middlesex County
- *Carlson v. C.H. Robinson Worldwide, Inc.*, Case No. CV 02-3780 (JNE/JJG), United States District Court for the District of Minnesota
- *Mann & Company, PC v. C-Tech Industries, Inc.*, Civil Action No. 1:08CV11312-RGS, United States District Court, District of Massachusetts
- *In re Calpine Corporation ERISA Litigation*, Master File No. C 03-CV-1685 (SBA), United States District Court, Northern District of California, Oakland Division
- *Payson v. Capital One Home Loans, LLC* (KWPA Settlement), Case No. 07-CV-2282-JTM/DWB, United States District Court for the District of Kansas at Kansas City
- *In re Cardinal Health, Inc. ERISA Litigation*, No. C2-04-643 (ALM), United States District Court, Southern District of Ohio, Eastern Division
- *In re Cbeyond, Inc. Securities Litigation*, Case No. 08-cv-1666-SAS, United States District Court, Northern District of Georgia
- *Milford & Ford Associates, Inc. and D. Michael Collins v. Cell-Tek, LLC*, C.A. No. 1:09-CV-11261-DPW, United States District Court, District of Massachusetts
- *Provo v. China Organic Agriculture, Inc.*, Case No. 08-cv-10810, United States District Court, Southern District of New York
- *Zelnick v. Citation Homes, Inc.*, Case No. 413861, Superior Court of California, County of San Mateo
- *Clearview Imaging, L.L.C. v. Dairyland Insurance Company*, Case No. 04-11399, Circuit Court of the Thirteenth Judicial Circuit in and for Hillsborough County, Florida, Civil Division
- *Clearview Imaging, L.L.C. v. Mercury Insurance Company of Florida*, Case No. 03-5170, Circuit Court of the Thirteenth Judicial Circuit of the State of Florida, in and for Hillsborough County, Florida, Civil Division
- *Clearview Imaging, L.L.C. v. Nationwide Mutual Fire Insurance Company*, Case No. 04-10396, Circuit Court of the Thirteenth Judicial Circuit in and for Hillsborough County, Florida, Civil Division

- *Clearview Imaging, L.L.C. v. Progressive Consumers Insurance Company*, Case No. 03-4174, Circuit Court of the Thirteenth Judicial Circuit in and for Hillsborough County, Florida, Civil Division
- *Meadows v. Clearwater Bay Marketing, LLC*, Cause No. 49C01-0812-PL-054708, Marion Circuit Court, Civil Division, Marion County, Indiana
- *In re CNX Gas Corporation Shareholders Litigation*, C.A. No. 5377-VCL, In the Court of Chancery of the State of Delaware
- *Canning v. Concord EFS, Inc.*, Docket No. L-6609-02, Superior Court of New Jersey, Law Division: Camden County
- *Cruz v. Condor Capital Corporation*, Docket No. MID-L-2108-06, Superior Court of New Jersey, Middlesex County: Law Division
- *In re Connetics Securities Litigation*, Case No. C 07-02940 SI, United States District Court for the Northern District of California
- *In re: The Consumers Trust*, Chapter 11, Case No. 05-60155 (REG), United States Bankruptcy Court, Southern District of New York
- *Hellmers v. Countrywide Home Loans, Inc.*, Case No. 07-7703, United States District Court, Eastern District of Louisiana
- *In re CP Ships Ltd. Securities Litigation*, Case No. 8:05-MD-1656-T-27 TBM, United States District Court for the Middle District of Florida
- *In re DDAVP Indirect Purchaser Antitrust Litigation*, Civil Action No. 05-cv-2237 (CS), United States District Court, Southern District of New York
- *In re Del Monte Foods Company Shareholder Litigation*, Case No. 6027-VCL, Court of Chancery, State of Delaware
- *Drury v. Countrywide Home Loans, Inc.*, Case No. 6:08-CV-152-ORL-28 DAB, United States District Court, Middle District of Florida, Orlando Division
- *Veal v. Crown Auto Dealerships, Inc.*, Case No. 8:04-CV-0323-T-27 MSS, United States District Court, Middle District of Florida, Tampa Division
- *The Louisiana Municipal Police Employees Retirement System v. Deloitte & Touche LLP*, Civil Action No. 04-621 (LDW), United States District Court, Eastern District of New York
- *Quaak v. Dexia, S.A.*, Case No. 03-CV-11566 (PBS), United States District Court, District of Massachusetts

- *Wells v. DTD Enterprises, Inc.*, Case No. L-9012-07, Superior Court of New Jersey, Middlesex County, Law Division
- *Broad St. Partners Fund v. Dods*, Case No. 2011 CH 001505, State of Illinois, County of Du Page, Circuit Court of the Eighteenth Judicial Circuit
- *In re Dura Pharmaceuticals, Inc. Securities Litigation*, Master File No. 99-cv-0151-JLS, United States District Court, Southern District of California
- *Yingling, et al. v. eBay, Inc.*, C 09 01733 JW (PVT), United States District Court, Northern District of California, San Jose Division
- *Coleman v. Edison Auto Sales, Inc.*, Civil Action, Docket No. MID-L-8168-09, Superior Court of New Jersey, Middlesex County: Law Division
- *Wyatt v. El Paso Corporation*, Civil Action No. H-02-2717, United States District Court, Southern District of Texas, Houston Division
- *In re Electronic Data Systems Corp. ERISA Litigation*, Case No. 6:03-MD-1512, Lead Case 6:03-CV-126, United States District Court, Eastern District of Texas, Tyler Division
- *Osborn v. EMC Corporation*, Case No. C 04-00336 JSW, U.S. District Court, Northern District of California, San Francisco Division
- *In re: Enterprise Rent-A-Car Wage & Hour Employment Practices Litigation*, MDL No. 2056, United States District Court for the Western District of Pennsylvania
- *Gilley v. Ernie Haire Ford, Inc.*, Case No. 02-8101, Circuit Court for the Thirteenth Judicial Circuit in and for Hillsborough County, Florida, Civil Division
- *Paskowitz v. Ernst & Young, LLP*, Civil Action No. A-08-CA-188-LY, United States District Court for the Western District of Texas, Austin Division
- *Long v. Eschelon Telecom, Inc.*, Case No. 27-CV-07-6687, Fourth Judicial District of the State of Minnesota, County of Hennepin
- *Family Open MRI, Incorporated v. Direct General Insurance Company*, Case No. 03-4175, Circuit Court for the Thirteenth Judicial Circuit in and for Hillsborough County, Florida, Civil Division
- *In re Fannie Mae ERISA Litigation*, Case No. 04-cv-01784, United States District Court, District of Columbia (Washington, D.C.)
- *Cotton v. Ferman Management Services Corporation*, Case No. 02-08115, Circuit Court of the Thirteenth Judicial Circuit in and for Hillsborough County, Florida, Civil Division

- *Zametkin v. Fidelity Management & Research Company*, No. 1:08-cv-10960-MLW, United States District Court, District of Massachusetts
- *Ori v. Fifth Third Bank and Fiserv, Inc.*, Case No. 08-CV-00432-LA, United States District Court, Eastern District of Wisconsin
- *Burns v. First American Bank*, No. 04 C 7682, United States District Court for the Northern District of Illinois, Eastern Division
- *In re FLAG Telecom Holdings, Ltd. Securities Litigation*, Case No. 02-CV-3400, United States District Court, Southern District of New York
- *Martin v. Foster Wheeler Energy Corporation*, No. 3:06-CV-878, United States District Court, Central District of California
- *Wenger v. Freehold Subaru, LLC*, Civil Action, Docket No. MON-L-4003-10, Superior Court of New Jersey, Monmouth County – Law Division
- *In re General Electric Co. Securities Litigation*, Civ. No. 09-CIV-1951 (DLC), United States District Court, Southern District of New York
- *In re Goodrich Shareholders Litigation*, Index No. 013699/2011, Supreme Court of the State of New York, County of Nassau: Commercial Division
- *In re Fremont General Corporation Litigation*, Case No. CV07-02693 JHN (FFMx), United States District Court for the Central District of California
- *In re Assicurazioni Generali S.p.A. Holocaust Insurance Litigation*, MDL 1374 M21-89 (GBD), United States District Court, Southern District of New York
- *Cottrell v. Gardner*, Civ. Action No. CV-2002-121(I) Superior Financial Corp. Derivative Action, State of Arkansas, Sebastian County, Arkansas
- *Securities and Exchange Commission v. Gen-See Capital Corp. and Richard S. Piccoli*, Civil Action 09-cv-00014S, United States District Court, Western District of New York
- *Mayes v. The Geo Group, Inc.*, Case No. 5:08-cv-248-RS/EMT, United States District Court, Northern District of Florida, Panama City Division
- *German Forced Labor Compensation Program (GFLCP)*
- *In re Gilead Sciences Securities Litigation*, Master File No. C-03-4999-SI, United States District Court, Northern District of California

- *Parthiban v. GMAC Mortgage Corporation*, Case No. SACV-05-768-ODW (MLGx), United States District Court, Central District of California, Southern Division
- *Pettway v. Harmon Law Offices, P.C.*, Case No. 03-10932-RGS, United States District Court, District of Massachusetts
- *Ultra Open MRI Corporation v. Hartford Casualty Insurance Company*, Case No. 07-CA-009132, Circuit Court of the Thirteenth Judicial Circuit in and for Hillsborough County, Florida, Civil Division
- *In re Hartford Financial Services Group, Inc. ERISA Litigation*, Master File: 3:08:cv-01708 (PCD), United States District Court, District of Connecticut
- *Brown v. Hayt, Hayt & Landau, LLC*, Case No. L-7042-07, Superior Court of New Jersey, Essex County, Law Division
- *In re Hearst-Argyle Shareholder Litigation*, Index No. 09-Civ-600926, Supreme Court of the State of New York, County of New York
- *Walker v. Hill Wallack LLP*, Case No. MID-L-003480-08, Superior Court of New Jersey, Middlesex County, Law Division
- *In re Holocaust Victim Assets Litigation (Swiss Banks) (HVP)*, Master Docket No. CV-96-4849, United States District Court, Eastern District of New York
- *Olivo v. Homecomings Financial LLC*, Index No. 4625/06, Supreme Court of the State of New York, Nassau County
- *Hudson United Bank v. Chase*, Docket No. L-235-05, Superior Court of New Jersey, Hunterdon County
- *In re ICG Communications, Inc. Securities Litigation*, Civil Action No. 00-cv-1864-REB-BNB, United States District Court for the District of Colorado
- *Valuepoint Partners, Inc. v. ICN Pharmaceuticals, Inc.*, Case No. SACV 03-989 DOC (Anx), United States District Court, Central District of California
- *In re: Infosonics Securities Litigation*, Civil Action No. 06-CV-1231-JLS (WMC), District Court for the Southern District of California
- *The International Commission on Holocaust Era Insurance Claims (ICHEIC)*
- *In re International Business Machines Corp. Securities Litigation*, 1:05-cv-6279 (AKH), United States District Court, Southern District of New York

- *In re Iowa Ready-Mix Concrete Antitrust Litigation*, No. C10-4038-MWB (Consolidated Cases), In the United States District Court, Northern District of Iowa, Western Division
- *Silke v. Irwin Mortgage Corporation*, Cause No. 49D03-0304-PL-000697, State of Indiana, Marion Superior Court, Civil Division
- *Lehmann v. Ivivi Technologies, Inc. et al.*, Docket No. C-343-09, Superior Court of New Jersey, Bergen County, Chancery Division
- *In re J. Crew Group, Inc. Shareholder Litigation*, C.A. No. 6043-CS, In the Court of Chancery of the State of Delaware
- *Norfleet v. John Hancock Life Insurance Company*, Civil Action No. 3:04-cv-1099 (JBA), United States District Court, District of Connecticut
- *Paliotto v. The Johnny Rockets Group, Inc.*, Case No. 1:06-cv-02253-RCL, United States District Court for the District of Columbia (Washington, D.C.)
- *Cohen v. JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A.*, Case No. 04-CV-4098, United States District Court, Eastern District of New York
- *Blanco v. KeyBank USA, N.A.*, Case No. 08-1-03-CV-524, United States District Court, Northern District of Ohio, Eastern Division
- *In re: King Pharmaceuticals, Inc. Securities Litigation*, Lead Case No. 2:03-CV-77, United States District Court, Eastern District of Tennessee, Greeneville Division
- *Holley v. Kitty Hawk, Inc.*, Case No. 3-00 CV 0828-P, United States District Court for the Northern District of Texas, Dallas Division
- *Mann v. Lawyers Title Insurance Corporation*, Case No. 03-CH-15223, Circuit Court of Cook County, Illinois, County Department, Chancery Division
- *Rolark v. Lawyers Title Insurance Corporation*, Case No. 03-CH-13789, Circuit Court of Cook County, Illinois, County Department, Chancery Division
- *Acevedo v. Lawyers Title Insurance Corporation*, Case No. 03-CH-07718, Circuit Court of Cook County, Illinois, County Department, Chancery Division
- *In re LDK Solar Securities Litigation*, Master File No. C 07-05182 WHA, United States District Court, Northern District of California
- *DeCario v. Lerner New York, Inc.*, Case No. BC 317954, Superior Court of the State of California, Los Angeles County

- *In re Lernout & Hauspie Products Securities Litigation* (Directors and FLV Settlements), Case No. 1:00-cv-11589, United States District Court for the District of Massachusetts
- *In re Lernout & Hauspie Products Securities Litigation* (KPMG Settlement), Case No. 04-CV-1738, United States District Court for the District of Massachusetts
- *In re Limelight Networks, Inc. Securities Litigation*, Master File No. CV07-01603-PHX-SRB, United States District Court, District of Arizona
- *Coleman v. Lincoln Wood Products, Inc.*, Case No. 99-CVS-1362, General Court of Justice, New Hanover County, North Carolina, Superior Court Division
- *Serino v. Kenneth Lipper, et al. and Williamson v. PricewaterhouseCoopers LLP*, Index No. 04/602106, Supreme Court of the State of New York, County of New York
- *Capovilla v. Lone Star Technologies, Inc.*, Cause No. 07-02979, District Court of Dallas County, Texas, 14th Judicial District
- *In re Marine Hose Antitrust Litigation*, Master Docket No. 08-MDL-1888, United States District Court, Southern District of Florida, Miami Division
- *In re Marsh ERISA Litigation*, Master File No. 04 cv 8157 (CM), United States District Court, Southern District of New York
- *In re Martek Biosciences Corp. Securities Litigation*, Civil Action No. MJG 05-1224, United States District Court, District of Maryland, Northern Division
- *Hughley v. Maryland Casualty Company*, Case No. 06-21428-CIV-ALTONAGA, United States District Court for the Southern District of Florida, Miami Division
- *In re MBNA Corp. Securities Litigation*, Case No. 1:05-CV-00272-GMS, United States District Court, District of Delaware
- *The Lafayette Life Insurance Company v. City of Menasha*, Cause No. 4:09-CV-64-APR, United States District Court, Northern District of Indiana, Hammond Division (Lafayette)
- *In re Merck & Co., Inc. Vytarin ERISA Litigation*, Civil Action No. 08-CV-1974 (DMC), United States District Court, District of New Jersey
- *In re Metavante Technologies, Inc. Shareholder Litigation*, Case No. 09-cv-5325, State of Wisconsin, Milwaukee County Circuit Court
- *Fray-Witzer v. Metropolitan Antiques, LLC*, Civil Action No. 02-5827, Commonwealth of Massachusetts, Superior Court, Department of the Trial Court, Suffolk Division

- *Black v. Metso Paper USA, Inc.*, Case No. 3:05-CV-19951, United States District Court, Middle District of Pennsylvania
- *Rubin v. MF Global, Ltd. et al.*, Case No. 08 Civ. 2233 (VM), United States District Court, Southern District of New York
- *In re: Micromuse, Inc. Securities Litigation*, Case No. C-04-0136BZ, United States District Court, Northern District of California
- *Smith v. Mill-Tel, Inc.*, Case No. 08-CV-2016-JAR/JPO, United States District Court, District of Kansas, at Kansas City
- *Rupp v. Thompson*, File No. C5-03-347, State of Minnesota District Court, County of Lyon, Fifth Judicial District
- *Wisniak v. Mirant Americas Generation, LLC*, Civil Action No. 1:03-CV-2049-BBM, In the United States District Court for the Northern District of Georgia, Atlanta Division
- *In re: MK Resources Company Shareholders Litigation*, Consolidated Case No. 1692-VCS, Court of Chancery, New Castle County, State of Delaware
- *Arteaga v. Moda Furniture, Inc.*, Docket No: L-000980-05, Superior Court of New Jersey, Morris County: Law Division
- *In re Motive, Inc. Securities Litigation*, Civil Action No. A-05-CV-923-LY and *Adair v. Motive* (the “Derivative Action”), Case No. A-06-CA-017-LY, United States District Court, Western District of Texas
- *In re National City Corporation Securities, Derivative & ERISA Litigation*, Case No. 08-nc-70000, United States District Court for the Northern District of Ohio, Eastern Division
- *Greenstein v. Nations Title Agency of Florida*, Case No.: 50 2007 CA 014085 XXXMBAA, In the Circuit Court of the 15th Judicial Circuit in and for Palm Beach County, Florida
- *Ultra Open MRI Corporation v. Nationwide Assurance Company*, Case No. 03-010725, Thirteenth Judicial Circuit Court in and for Hillsborough County, Florida, Division H
- *Curtis v. Northern Life Insurance Company*, No. 01-2-18578-1 SEA, Superior Court of Washington for King County
- *In re Novamed, Inc. Shareholders Litigation*, Case No. 6151-VCP, Court of Chancery in the State of Delaware
- *In re NX Networks Securities Litigation*, Case No. 00-CV-11850 (JLT), United States District Court, District of Massachusetts

- *Lilly, et al. v. Oneida Ltd. Employee Benefits Admin. Comm., et al.*, Case No. 07-cv-00340, United States District Court, Northern District of New York
- *Evan Fray-Witzer v. Olde Stone Land Survey Company, Inc.*, Superior Court C.A. No. 2008-04175, Commonwealth of Massachusetts
- *Hess v. Oriole Homes Corp.*, Case No. CA 02-13794AA, Circuit Court of the 15th Judicial Circuit, Palm Beach County, Florida
- *Warren v. Orkin Exterminating Company, Inc.*, Civil Action No. 01-1-8395-35, In the Superior Court of Cobb County, State of Georgia
- *In re OSI Pharmaceuticals, Inc. Securities Litigation*, Master File No. 2:04-CV-05505-JS-WDW, United States District Court, Eastern District of New York
- *Scher v. Oxford Health Plans, Inc.*, AAA No. 11 193 00548 05, American Arbitration Association
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NOTABLE ENGAGEMENTS

Project HEART – Holocaust Era Asset Restitution Taskforce: In February 2011, A.B. Data was appointed as the Administrator of Project HEART (Holocaust Era Asset Restitution Taskforce) to provide the essential tools, strategy, and information that will ultimately enable the Government of Israel and its partners to secure a measure of justice for eligible Jewish victims and their heirs. Since its inception, Project HEART has become one of the most comprehensive multilingual notice campaigns ever undertaken, covering 126 countries. As part of its efforts, A.B. Data launched a multilingual, interactive website (heartwebsite.org), established a 24-hour call center using 13 languages, distributed more than 500,000 documents to potentially eligible families of Holocaust victims, handled over 80,000 calls, conducted archival research, and created the most comprehensive online repository in history, with records of more than 2 million looted Holocaust-era properties. In addition, A.B. Data reached out to 15,000 nongovernmental organizations that are now engaged in the project, assisted thousands of Holocaust victims and their heirs, established an active social media campaign, held numerous press conferences, participated in dozens of radio programs, and processed tens of thousands of claims.

Holocaust Victim Assets Litigation (Swiss Banks): In this \$1.25 billion settlement, as the court-appointed Notice Administrator, Ms. Verkhovskaya played a key role in a worldwide Phase I notice program that resulted in the processing of more than 500,000 initial questionnaires. In Phase III, A.B. Data delivered notice to over 10,000 Jewish communities in 109 countries and administered international help and call centers in Phases I and III that directly assisted more than 100,000 potential claimants. A.B. Data created a class-appropriate notice targeting Romanians (Gypsies) in 48 countries and directed hundreds of staff members in communicating orally and directly with Romani communities and individuals. A.B. Data notified more than 2 million people and, as designated by the International Organization for Migration (IOM), directly assisted more than 22,000 Romanians in 17 countries of central and eastern Europe with claim completion.

German Forced Labor Compensation Programme (GFLCP): As designated by IOM, A.B. Data, under the direction of Ms. Verkhovskaya, located more than 43,000 Romani survivors in 17 countries of central and eastern Europe who were potentially eligible for humanitarian aid. A.B. Data created a comprehensive database for the GFLCP and the Holocaust Victim Assets Programme and directly assisted more than 11,000 Romanians in eight central and eastern European countries with claim completion.

ADDITIONAL INFORMATION

Prior to joining A.B. Data, Ms. Verkhovskaya served in a variety of consulting, community outreach, and film production roles. She has worked with Steven Spielberg, heading the European and Asian operations of the Shoah Foundation, was a producer of the 1999 Oscar-winning Best Documentary Feature, *The Last Days*, and won the 54th Annual Christopher Award in Television & Cable for her co-production efforts in *Children from the Abyss* (2001).

Ms. Verkhovskaya has served on the Advisory Committee for New Émigrés in New York City and is a founder and member of the Board of Directors of the Archive: Institute of Russian Jewish American Diaspora, New York City, a nonprofit organization whose Honorary Chair is Sir Martin Gilbert and that was founded to preserve the history and collective memory of the Jewish immigrant community from the former Soviet Union.

EXHIBIT B

**DETAILED INFORMATION
ABOUT A.B. DATA, LTD., AND ITS SERVICES**

creating lasting partnerships

Innovative technology.
Extraordinary human talent.
Unmatched expertise, resources, and capacity.



ABOUT A.B. DATA

Founded in 1980, A.B. Data has earned an international reputation for expertly managing the complexities of class action administration in securities, Securities and Exchange Commission (SEC) enforcement actions, ERISA, consumer, antitrust, employment, civil rights, insurance, environmental, wage and hour, and other class action cases. A.B. Data's work in all aspects of class action administration has been perfected by decades of experience. Dedicated professionals deliver A.B. Data's all-inclusive services, working in partnership with its clients to administer their class action cases effectively, efficiently, and affordably, regardless of size or scope.

A.B. Data is the fastest-growing company in this industry, with more than \$2.5 billion in settlements currently in various stages of administration. Ranked according to percentage of revenue growth from 2006 through 2009, A.B. Data was among the 5,000 fastest-growing companies on the *2010 Inc and 2013 . 500/5000*, an exclusive ranking of the nation's entrepreneurial businesses. Based on revenue growth and a number of additional qualifying factors, we are the only class action administration company to achieve this elite standing in 2010.

Whether notifying millions of class members in the United States or throughout the world, processing millions of claims, or printing and distributing millions of checks, A.B. Data matches its talent and technology to the specific needs of its clients, delivering unparalleled service on time and on budget without ever compromising quality.

With more than 500 employees, A.B. Data offers unmatched resources and capacity, and is capable of expertly administering any class action notice, settlement, and/or fund administration. We offer the highest level of security and have the in-house capacity to mail four million personalized pieces every 24 hours. The company's 187,000-square-foot mail distribution center, with its own on-site United States Postal Service (USPS) substation, is one of the nation's largest and most advanced facilities. In addition, A.B. Data has been entrusted to MICR-print and mail 70,000 checks a week, totaling more than \$1 billion annually, and has the capacity to print and mail one million checks per day.

A.B. Data has administered some of the largest and most complex class action cases in history. Our success is driven by passion for class action administration and our focus on client relationships. An intensely case-specific approach and a philosophy of respect and professionalism toward our clients and claimants guide every aspect of our work, from the presettlement phase through notice administration, claims processing, and fund distribution.

A.B. Data administers class action cases on schedule and on budget with accuracy and efficiency. Trust the extraordinary, experienced professional talent at A.B. Data, and retain our services.

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A.B. DATA, LTD.

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FACTORS THAT DIFFERENTIATE A.B. DATA

- A.B. Data's competitive and transparent pricing structure contains no hidden fees or unpredictable hourly rates. No additional services or costs are incurred without clients' prior approval
- Our experienced class action administration team includes attorneys and CPAs that handle every aspect of the administration and deliver an impeccable work product with exemplary service. Our executive and management professionals have, on average, 14 years or more of industry experience and client services/project employees average 10 years
- We rapidly respond to our clients' needs and strive to exceed their expectations in every detail
- A.B. Data's notice programs are known worldwide for their innovation, efficiency, and compliance with due process requirements
- Our customized approach results in simplified claims processing, quick distributions, and considerable cost savings
- A.B. Data's proprietary fraud detection database prevents payment of fraudulent claims
- Our recently renovated call center operates 24/7 and contains state-of-the-art telecommunications systems designed to meet the requirements of all administration projects
- Our cutting-edge information and systems technologies enable us to provide superior quality control and assurance
- The proprietary online claims submission system allows class members to submit claims in a fast, flexible, and cost-effective manner
- A.B. Data offers the highest level of security and has the in-house capacity to mail four million personalized pieces every 24 hours. A.B. Data's 187,000-square-foot mail distribution center, with its own on-site USPS substation, is one of the nation's largest and most advanced facilities
- We maintain a neutral focus when working with its multiple clients, including class counsel, defense counsel, defendant companies, special masters, and claims-filing services
- A.B. Data's in-house print, mail, and operational facilities streamline communication and maintain the highest level of security
- Documents are designed to withstand legal scrutiny through accurate, efficient, and timely preparation
- Clients receive updates with the latest developments in class action and industry news



CLASS ACTION ADMINISTRATION SERVICES

PRESETTLEMENT CONSULTATION

A.B. Data helps its clients to prepare a stronger case. During investigation and discovery, our electronic records management and proven procedures enable our team to quickly provide a fully interactive media package for court presentations and settlement negotiations.

By retaining A.B. Data, clients gain confidence that their case management is rock-solid from the start with

- Document analysis, organization, and conversion into an interactive media package
- Consultation on proposed plans of allocation and damages analyses by experienced securities litigators and certified public accountants
- Assistance with “reach and frequency” analysis
- Consultation for designing and implementing preliminary notice programs that will withstand objections and challenges, as well as meet legal statutes and CAFA requirements
- Consultation to determine probable claim rates and settlement structures in an effort to avoid unexpected delays and additional costs that can arise when providing notice and distributing a settlement fund

NOTICE ADMINISTRATION

A.B. Data is an industry leader in full-service class action notice administration. Our class action notice programs are known worldwide for their efficiency, effectiveness, affordability, and compliance with Federal Rule of Civil Procedure 23 and due process requirements. Our services include class member location; third-party outreach; and media, Internet, email, and direct-mail notice.

A.B. Data have designed and implemented some of the largest and most complicated national and international antitrust and class action notifications in the world. Globally, A.B. Data has successfully notified millions of class members throughout 137 countries in more than 80 languages. Domestically, as part of our multifaceted approach to class member location, A.B. Data is a licensee of various postal products, including NCOALink, which tracks millions of moves across the United States.

As a leading class action notice administrator, A.B. Data produces high volumes of notice documents with accuracy, speed, and quality. We print customized notice packages in a cost-efficient format that substantially improves the efficacy of the notice program.

A.B. Data’s team of class action attorneys, professional proofreaders, and design specialists ensure that all notice packages are clear, accurate, and easy to understand.

- Identify and locate potential class members via proprietary methods and research tools
- Design and implement synergistic media notice campaigns (online, print, radio, and television)
- Develop and implement case-specific third-party outreach campaigns
- Coordinate legal translation of notice documents
- Draft CAFA notice, identify appropriate government agencies, and disseminate CAFA notice
- Utilize a proprietary list of over 5,000 domestic and international banks, brokers, and other nominees (for securities class action cases and SEC enforcement actions)

PUBLICATION NOTICE, PRINT, SOCIAL MEDIA, AND DIGITAL MEDIA

A.B. Data’s Media Notice Division led by Linda V. Young, a media veteran with decades of class action media notice expertise in some of the most prominent cases in the industry. As Vice President, Media, Young will develop Media Notice Plans along with Anya Verkhovskaya, COO and Notice Expert, Heather Marsh, Director, Digital Marketing, and Kelly Gardner, Vice President, Direct Mail and List Services.



The Media Notice Division will also provide expertise on Rule 23, MRI-generated audience analysis, reach and frequency analysis, plus direct-marketing tactics to reach unidentified class members. We are confident that under Young's leadership, the A.B. Data Media Division will continue to expand the array of targeted media solutions for Class Action Notice programs.

CLAIMS PROCESSING

A.B. Data's customized approach combines accuracy, accountability, and speed with our human touch. Each claim is reviewed in detail and processed precisely in accordance with the court-approved plan of allocation or settlement stipulation. A.B. Data's claims-processing services include paper and electronic claims processing, with optical character recognition technology to convert claims and correspondence into electronically searchable databases.

A.B. Data's proprietary Claims Engine, created by expert software engineers in collaboration with the Claimant Services Department, offers an extremely flexible workflow engine that allows high-speed claims imaging and processing without compromising quality. The database's high level of automation allows maximum control and provides a comprehensive and accurate claims solution. The A.B. Data Claims Engine contains the following special features:

- Eligibility criteria formula, which allows automatic flagging of claimants who do not meet the established criteria
- High-speed, bar-coded claims-processing system
- Complete tracking of all claims administration-related activities
- Case-specific algorithms and formulas for the calculation of individual payments and *pro rata* distribution.

When processing is complete and recommendations must be made to the court for settlement distribution, A.B. Data prepares timely affidavits that are accurate, concise, supported by the required documentation, and designed to withstand legal scrutiny. A.B. Data has the in-house capacity to process millions of pages, but every process is transparent, and every claim is handled as if it were the only one.

Whether processing a claim form requires only a signature or detailed data with supporting documentation, A.B. Data's claims administration team

- Prepares affidavits and recommendations drafted by experienced class action litigators and accounting professionals
- Assures that lead plaintiff's claim is filed timely and correctly
- Verifies claims substantiations, as well as flag deficiencies and resolutions
- Detects and rejects fraudulent, duplicate, or excluded-party claims
- Processes exclusion requests and objections within two hours of receipt
- Calculates recognized losses and individual payments
- Manages claim-related correspondence
- Audits claims-processing, including quality control and quality assurance
- Provides comprehensive on-demand reporting

DEVELOPMENT OF DISTRIBUTION PLAN

A.B. Data's team of fund administration professionals includes former class action attorneys, certified public accountants, and certified financial analysts and auditors. They bring years of dedicated experience assisting investors with SEC enforcement actions and private securities litigations.

We have developed hundreds of distribution plans, all in accordance with applicable orders, laws, regulations, policies, and procedures. Our customized approach to every case results in timely distributions, user-friendly claims processes, and greater cost savings. Depending upon the circumstances of each action, A.B. Data works in concert with our clients to conduct relevant economic and financial analyses, develop related methodologies for loss calculation, create appropriate plans of allocation, and if applicable, generate a targeted notice program and claims process.



FUND DISTRIBUTION

A.B. Data provides a full-service solution to settlement fund distribution. Our team of certified public accountants and financial advisors expertly manages fund distribution while meeting legal, financial, and governmental requirements. We offer complete escrow services, establish qualified settlement funds; print and mail checks, vouchers, or coupons; electronically distribute cash or stock; and provide tax services.

- Establish and maintain accounts (escrow, FDIC-insured controlled distribution, or managed distribution), with daily account reconciliations and records of all distributions
- Create fund investment strategies
- Electronically transfer cash and/or common stock
- Utilize positive pay
- Securely print checks (up to a million per day)
- Monitor outstanding and cleared checks
- Investigate and attempt to resolve issues with undelivered checks
- Provide detailed reporting, including completion of the standardized fund accounting report (SFAR)
- Offer all-inclusive tax and accounting services, including 1099 and W-2 tax reporting

CALL CENTER

A.B. Data's newly renovated, multilingual call center utilizes state-of-the-art telecommunications systems designed to meet the specific requirements of any administration project, as well as to maximize the financial and service goals of our clients.

The call center is managed by full-time staff well-versed in the specific details of every case. Our skilled multilingual customer service representatives are trained using case-specific materials and resources, and use telephone scripts written by our attorneys and approved by our clients.

Quality assurance and quality control procedures ensure the transmission of clear and accurate information to class members in a courteous and professional manner. The call center is able to handle large call volumes for notice mailing and emailing, claims administration, deficiency and rejection letter mailings, and distribution check mailing.

In addition to providing class members with superior quality service, our customer service representatives can respond to online and email inquiries; document notice, claim form, and call-back requests; and return calls within 24 hours regarding the status of the administration.

Clients may also utilize A.B. Data's advanced interactive voice response (IVR) system, which is a cost-effective way for class members to receive informational announcements, request notices and claim forms, and obtain case-specific details. The IVR system provides toll-free telephone numbers, multilingual customer service representatives, and Teletype (TTY) for deaf and hearing-impaired individuals.

WEBSITE SERVICES

In cases where a website is required, **A.B. Data designs, hosts, and maintains a website** wherein class members have access to relevant case information and updates, key documents, and downloadable notice and claim documents. Depending upon the circumstances of the case, the website could list the following:

- Case status
- Responses to frequently asked questions
- Online claim forms and instructions
- Case contact information

For all web-based features, A.B. Data's system has complete functionality using the three most recent versions of industry-standard browsers. Samples of case-specific websites developed by A.B. Data can be obtained by referencing cases on our website at abdataclassaction.com.



SECURE ENVIRONMENT

A.B. Data's facilities provide the highest level of security and customization of security procedures, including

- A Secure Sockets Layer server
- Video monitoring
- Limited physical access to production facilities
- Lockdown mode when checks are printed
- Background checks of key employees completed prior to hire
- Police response time—two minutes
- Frequency of police patrol—under five minutes
- Disaster recovery plan available upon request

DATA SECURITY

A.B. Data is committed to protecting the confidentiality, integrity, and availability of information we collect from our clients, investors, and class members. We transmit, save, and process an immense quantity of electronic information on a daily basis. A.B. Data's Information Security Policy contains procedures intended to address all information security issues for A.B. Data's divisions, departments, employees, vendors, and clients.

A.B. Data has a number of high-profile clients, including the Securities and Exchange Commission (SEC), the United States Government, and the Government of Israel, direct-banking and payment-service companies for popular brands, and some of the largest credit card issuers in the world.

A.B. Data is frequently subject to physical, logical, data, and information system security reviews and audits. We are compliant with our clients' security standards as well as with ISO/IEC 27001/2 and Payment Card Industry (PCI) data-security standards, the Gramm-Leach-Bliley Act of 1999, the National Association of Insurance Commissioners' regulations, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and the Health Information Technology for Economic and Clinical Health Act (HITECH).

The Government of Israel recently determined A.B. Data is compliant with its rigorous security standards in connection with its work on Project HEART (Holocaust Era Asset Restitution Taskforce).

A.B. Data's fund distribution team has been audited by EisnerAmper LLP and was found compliant with the class action industry standards and within 99% accuracy. EisnerAmper LLP is a full-service advisory and accounting firm and is ranked the 15th largest accounting firm in the United States.

In addition, as part of PCI compliance requirements, A.B. Data has multiple network scans and audits from third-party companies, such as SecurityMetrics and 403 Labs, and is determined to be compliant with each of them.

FRAUD PREVENTION AND DETECTION

A.B. Data is at the forefront of class action fraud prevention. Anya Verkhovskaya, the Senior Executive Vice President and Chief Operating Officer, was recently chosen by Francis McGovern, the eminent legal practitioner and scholar at Duke University School of Law, to spearhead an industry-wide task force on fraud prevention and detection.

A.B. Data maintains and utilizes comprehensive proprietary databases and procedures to detect fraud and prevent payment of allegedly fraudulent claims. We are in constant communication and collaboration with federal, state, and local law enforcement agencies in an effort to identify and prevent fraudulent claims from being paid.

On a daily basis our fraud prevention research team collects and reviews media clippings regarding any ongoing or new investigations of potentially fraudulent filers. We also review and analyze various filing patterns across all existing cases and claims. A.B. Data's fraud prevention research team reviews the patterns on a quarterly basis. Potential fraudulent filers are reported to our clients as well as the appropriate governmental agencies.



ACCOUNTABILITY AND REPORTING

A.B. Data has the expertise necessary to provide project-management services to ensure that all work is completed timely, accurately, and precisely to our clients' specifications. Upon request, we provide affidavits detailing the methodologies employed in notice administration, claims processing, and fund administration, as well as expert testimony and audit trail reporting.

A.B. Data tracks and audits every aspect of daily production with

- Receipt of files (noting any issues with transmission)
- Status reports regarding claims or check status
- Audited and confirmed record counts
- Confirmation of mailings
- Inventory counts
- Daily production counts reported on a weekly basis.

Once funds are fully distributed, we provide a detailed accounting of fund sources and usage with a listing of individual disbursements. We maintain records of all disbursements to answer class member inquiries, investigate and resolve undelivered material, monitor outstanding and cleared checks, and maintain mailing and financial databases for an agreed-upon period.

COMMUNITY AND DIVERSITY

A.B. Data maintains employment policies that highlight and support diversity within the company, and utilizes employment programs that benefit minorities in the community. At the company's mail processing center located in a HUBZone (Historically Underutilized Business Zone), more than half of the employees are minorities. A.B. Data continues to partner with community organizations to increase minority employment opportunities and benefits.

By participating in employment service programs, such as the Transitional Jobs Demonstration Project, A.B. Data helps to create jobs and build partnerships that improve people's lives with valued job opportunities. Operated by Policy Studies, Inc. (PSI), this important project helps to connect Milwaukee-area employers with qualified job seekers.

As part of the 30th Street Industrial Corridor, a nonprofit organization that advocates on behalf of the corridor-area community, A.B. Data works diligently to restore the economic vitality of the area, providing industry, jobs, and safety to its members, residents, and visitors.

In addition, A.B. Data's mail processing center is located in Milwaukee's Renewal Community, a targeted area that was designated for renewal from 2002 to 2009. A.B. Data partnered with other businesses to guide and promote development that created jobs, generated wealth, and strengthened the urban environment.

A.B. Data maintains its assistance to workers in need of additional services through State of Wisconsin employment programs, such as Welfare-to-Work (WtW), so that eligible employees receive FoodShare and medical benefits, as well as daycare services. Through participation in these and other available employment programs, A.B. Data continues in its commitment to enhancing people's lives by providing quality employment opportunities.

ENVIRONMENTALLY-FRIENDLY BUSINESS

A.B. Data conserves its resources and operates as a green business. Paper claim forms are imaged and stored on A.B. Data's secure SQL server and all claims processing is done electronically. We emphasize the need for recycling and encourage the use of recycled products. Our policies compel employees to turn off their computers when not in use, and email communications are encouraged to the extent possible.

A.B. Data's new headquarters in Milwaukee was designed with the environment in mind. Upon purchasing the 16-acre campus in September 2007, A.B. Data renovated the 30-year-old building, utilizing natural elements such as cork, bamboo, and concrete, and upgraded its mechanical and electrical systems to optimize efficiency. For its efforts, A.B. Data took second place in *The Business Journal* of Milwaukee's Real Estate Awards for the Best Environmentally Friendly Project.



A.B. DATA'S LEADERSHIP

A.B. Data's administration team is composed of the following key executives, who collectively have decades of experience litigating, settling, and administering class actions:

Bruce A. Arbit, Co-managing Director, one of the founders of the A.B. Data Group, serves as Chairman of the Board. Additionally, Mr. Arbit is the Chairman of the United Israel Appeal and has served as President and General Campaign Chair of the Milwaukee Jewish Federation. Mr. Arbit currently serves as the Treasurer of the Jewish Telegraphic Agency and on the Boards of the Milwaukee Jewish Community Foundation and the American Joint Jewish Distribution Committee. Mr. Arbit has been a member of the Jewish Agency for Israel Board of Governors since June 2002, is a member of the Jewish Agency Executives, and chairs the Committee on Israel Government Relations. Mr. Arbit served as a Director of a Community Bank for over 25 years.

Thomas R. Glenn, President. Mr. Glenn's top-level management of the Class Action Administration Company includes designing and implementing notice plans and settlement administration programs for antitrust, securities, Securities and Exchange Commission settlements and disgorgement fund distributions, as well as consumer, employment, insurance, and civil rights actions. Mr. Glenn previously served for more than 10 years as Executive Vice President for Rust Consulting.

Anya Verkhovskaya, Partner and Chief Operating Officer, winner of the 2011 Best Executive Stevie Award for Women in Business, has over 13 years of experience administering class actions. Ms. Verkhovskaya has overseen the administration of hundreds of class action cases, including mortgage-related matters, securities, human rights, product liability, ERISA, employment, discrimination, antitrust, and consumer, as well as fund distributions in Securities and Exchange Commission enforcement actions. Ms. Verkhovskaya oversees all aspects of administration to ensure the delivery of an impeccable product and exemplary service. Ms. Verkhovskaya leads a team of legal, accounting, finance, information systems, information technology, claims administration, and facilities and operations professionals. Additionally, Ms. Verkhovskaya was appointed by the Government of Israel the Administrative Director of the Holocaust Era Asset Restitution Taskforce.

Linda Young, Vice President of Media, oversees the Media Department and is responsible for the direction, development and implementation of media notice plans for A.B. Data's class action clients. Prior to joining A.B. Data, Ms. Young served as the Principal of Mile Marker Zero, LLC, a full-service marketing and advertising consulting firm. She has over 20 years of marketing, advertising, and media planning experience, managing advertising for brands such as Georgia-Pacific, American Express, Denny's and Coca-Cola. In addition, Ms. Young has developed and implemented national and international print and earned media notice programs in some of the industry's leading pharmaceutical, insurance, and securities class action cases, including Premarin, Unity Life Insurance Co., and Morgan Stanley.

Eric Miller, Vice President of Client Services, oversees the Case Management Department and supervises the operations and procedures of all of A.B. Data's class action administration cases. Prior to joining A.B. Data, Mr. Miller served as the Client Service Director for Rust Consulting, responsible there for its securities practice area. He has over 12 years of operations, project management, quality assurance, and training experience in the class action administration industry. Mr. Miller manages A.B. Data's office in Palm Beach Gardens, Florida.

Paul Sauberer, Director of Quality Assurance, is responsible for overseeing quality assurance and process management, working diligently to mitigate risk, ensure exceptional quality control, and develop seamless calculation programming. Mr. Sauberer brings over 14 years of experience as a quality assurance specialist with a leading claims processing company where he developed extensive knowledge in securities class action administration.

Al Wichtoski, CPA, Vice President and Chief Financial Officer, began as a Controller with A.B. Data over 20 years ago. Mr. Wichtoski rose to a number of corporate administrative and financial management positions before realizing his current role with the company. Mr. Wichtoski attained his financial



management expertise through a broad range of roles, including bank liaison, Internal Revenue Service conduit, and final compliance officer for all financial accounts associated with A.B. Data. Mr. Wichtoski responsibilities include risk management, budgeting, tax-filing, statement preparation, and financial analysis.

Kathy Versteegh, Vice President of Client Services and Marketing, has been with A.B. Data since 1993. Ms. Versteegh is currently responsible for Business Critical Communications, client service operations, and marketing, in addition to serving as a Security Team and Corporate Management Team member. Ms. Versteegh has earned U.S. Postal Service and Postal Customer Council (PCC) professional certificates in Management and Leadership, Intelligent Mail, Enhancing Mail Value, Mail Center Operations, and PCC Leadership. In May 2010, Ms. Versteegh was elected the United States Postal Customer Council Co-Chair. Currently, Ms. Versteegh is serving her second term as Co-Chair. With over 20 years of marketing services experience, Ms. Versteegh offers an outstanding track record in business/organizational development, client satisfaction, and marketing strategies that include print, internet, mail, trade show, and other sales and marketing communications.

Lizabeth Ludowissi, MQCCS, Vice-President of Production is responsible for overseeing the production of all A. B. Data Group mailings and special projects. Ms. Ludowissi has experience in virtually every role in the company, which provides her invaluable insight into the needs of our clients. During her tenure, Ms. Ludowissi has worked to streamline our Production Department, implementing strict quality controls and overseeing all scheduling and coordination, including print purchasing as well as data processing, personalization and mailshop services. As a Mailpiece Quality Control Certified Specialist (MQCCS), Ms. Ludowissi acts as Postal Liaison on all United States Postal Service (USPS) related matters. Ms. Ludowissi is a member of the Wisconsin Direct Marketing Association and the Milwaukee Postal Customer Council.

Christina Peters-Stasiewicz, Senior Project Manager, has nearly 10 years of extensive experience in class action administration, administering high-volume securities litigations as well as consumer, wage and hour, antitrust, ERISA, product liability and insurance-related matters. Ms. Peters-Stasiewicz facilitates and oversees the notice process, summary notice publication, website design and maintenance, call center management, claims processing, settlement fund allocation and disbursement, and client reporting and affidavits effectively and cost-efficiently. Ms. Peters-Stasiewicz has managed many cases with over 500,000 class members and brings the highest level of commitment and quality to each of her client engagements.

Adam Walter, Senior Project Manager, has over six years experience managing a range of securities class action settlements and SEC disgorgement funds totaling more than \$2 billion. This includes overseeing notice dissemination programs, implementing complex claims processing and allocation methodologies, establishing quality assurance and control procedures, and managing the distribution of settlement funds. Mr. Walter frequently consults with clients in planning, reporting, and management of each unique case to ensure all requirements and objectives are met. Mr. Walter's background as Project Manager for a leading claims administrator brings expertise on the development of case administration strategies and service methodologies to A.B. Data's Class Action Administration Company.

Linda Smith, CPA, Quality Assurance Analyst, has over a decade of experience as a broker-dealer auditor, trainer, manager, and is a Certified Anti-Money Laundering Specialist. Ms. Smith is responsible for managing and performing financial analysis, reviewing plans of allocation, working with independent distribution consultants, and performing account reconciliations for fund distributions. Prior to joining A.B. Data, Ms. Smith conducted audits for Northwestern Mutual, where Ms. Smith was a subject-matter expert for anti-money laundering and broker-dealer audits. Ms. Smith was also in charge of performing financial and compliance audits for broker-dealers and futures-commission merchants at the Chicago Board of Trade.

Kevin Ziegler, Information Systems Manager, brings over 12 years of website, custom software development, network design and implementation, and business consulting skills to A.B. Data's Class Action Administration Division. Mr. Ziegler is responsible for overseeing all aspects of A.B. Data's technical processes and determining how they can best be leveraged throughout the administration and fund distribution process. In addition, Mr. Ziegler analyzes business lines and internal processes to ensure efficiencies across A.B. Data.



Eric Schultz, MCSE, Information Technology Manager and Security Team Chairperson, has been with A.B. Data for more than 10 years, and is currently responsible for overseeing all information technology areas for all A.B. Data divisions across the United States and abroad. As a Microsoft Certified Systems Engineer (MCSE) with over 20 years of experience in information technology systems and solutions, Mr. Schultz has developed specializations in network security, infrastructure, design/architecture, telephony and high availability network systems.

Dan Rieck, Esq., Project Manager, has seven years of experience as a criminal defense lawyer, personally litigating a number of jury trials and independently managing all legal research associated with cases. Attorney Rieck also served as Judge Advocate General's Corps in the United States Army Reserve, and was deployed to Iraq as the Chief of Legal Services and the Officer in Charge of Foreign Claims. Attorney Rieck's strong experience in criminal law, claims management, and research serve to bring clients clear, concise class action administration services.

Meghan Nemiroff, Esq., Project Manager, is responsible for managing client engagements while ensuring the highest level of customer satisfaction and providing ongoing counsel to assist clients with meeting all their class action administration goals. Attorney Nemiroff brings leadership, value, and experience to all projects attorney Nemiroff oversees, enabling A.B. Data to facilitate seamless administrations from notice to disbursement.

Nicholas Hoffman, Esq., Project Manager, provides the legal insight needed to ensure efficiency and accuracy in all areas of class action administration, including research, review, data gathering and assessment, plan preparation, and settlement. Attorney Hoffman, a former Director of Public Affairs and General Counsel for a large financial services software company, built his legal career on his class action experience, in both law and business.

Rebekah Thigpen, Esq., Project Coordinator, provides legal and administrative support for clients and key personnel, coordinating day-to-day case administration. Attorney Thigpen began with A.B. Data as a Team Leader, where attorney Thigpen managed the claims administration of dozens of settlements, supervised claims processing and ensured compliance with court ordered guidelines. As Case Coordinator, attorney Thigpen is responsible for drafting legal documents, creating and managing case websites, and handling client/claimant communications. In addition, attorney Thigpen provides quality control of case distributions. Attorney Thigpen holds a Juris Doctorate from Marquette University Law School.

Anike Tansey, Business Development Director, provides expertise in legal marketing strategies and brings extensive experience in client relations to A.B. Data's business development team. Previously, Ms. Tansey served the legal industry as part of the marketing group at a major class action law firm specializing in securities and antitrust litigation. Ms. Tansey's knowledge and understanding of the class action industry, as well as her client relationship skills, expand A.B. Data's capacity to effectively achieve its business development and marketing goals.

NOTABLE ENGAGEMENTS

Holocaust Era Asset Restitution Taskforce (Project HEART)

An initiative of the Government of Israel and the Jewish Agency for Israel (JAFI), Project HEART—Holocaust Era Asset Restitution Taskforce—aims to provide the tools, strategy, and information to bring about a small measure of justice to eligible heirs of Jewish victims, the victims themselves, and the Jewish people.

During the initial phase, Project HEART is focusing on identifying individuals in 137 countries with potential claims regarding the following types of private property for which no restitution was received after the Holocaust era: (1) private property that was located in countries that were controlled by the Nazi forces or Axis powers at any time during the Holocaust era; (2) private property that belonged to Jewish persons as defined by Nazi/Axis racial laws; and (3) private property that was confiscated, looted, or forcibly sold by the Nazi forces or Axis powers during the Holocaust era.



Obama for America 2008 and 2012

Retained by Obama for America in 2007, A.B. Data was responsible for designing, analyzing, and directing the grassroots fundraising efforts for the presidential campaign of 2008. From February 2007 to Election Day, A.B. Data's direct marketing efforts helped to elect President Barack Obama, raising almost \$108 million in the mail from over 700,000 donors. As a result, A.B. Data has been reappointed to lead President Obama's 2012 direct marketing campaign in an attempt to gain re-election. As the sole administrator of the direct marketing campaign for Obama for America 2012, A.B. Data designs, prints, and mails each direct marketing piece to raise money and awareness about President Obama's candidacy and efforts for re-election in 2012.

Doctors Without Borders

In 2009, A.B. Data was chosen to manage all facets of the direct mail program for Doctors Without Borders/Médecins Sans Frontières (MSF). MSF is one of the most respected organizations in the world, having won the 1999 Nobel Peace Prize for their emergency medical humanitarian response to people around the world caught in armed conflict; suffering from epidemics, malnutrition, and natural disasters without access to health care. They are known for their fierce independence and their refusal to look the other way when a crisis is caused by the failure of a government, either through passive or aggressive actions. MSF raises \$84 million a year through the direct marketing program, and they mail 17 million prospect pieces annually. MSF's house file consists of 465,000 12-month donors and about 800,000 lapsed donors—and they have 38,000 monthly donors. MSF's total house file volume is 11 million a year.

Holocaust Victim Assets Litigation (Swiss Banks)—\$1.25 billion settlement

As a court-appointed notice administrator, A.B. Data played a key role in a worldwide Phase I notice that resulted in the processing of more than 500,000 initial questionnaires. In Phase III, A.B. Data delivered notice to over 10,000 Jewish communities in 109 countries, and administered international help and call centers in Phases I and III that personally assisted more than 100,000 potential claimants.

A.B. Data created a class-appropriate notice targeting Romanies (Gypsies) in 48 countries and directed hundreds of staff to communicate orally and directly with Romani communities and individuals. A.B. Data notified more than two million people and, as designated by the International Organization for Migration (IOM), directly assisted more than 22,000 Romanies in 17 countries of central and eastern Europe with claim completion.

German Forced Labour Compensation Programme (GFLCP)

As designated by the IOM, A.B. Data located more than 43,000 Romani survivors in 17 countries of central and eastern Europe who were potentially eligible for humanitarian aid. A.B. Data created a comprehensive database for the GFLCP and the Holocaust Victim Assets Litigation and directly assisted more than 11,000 Romanies in eight central and eastern European countries with claim completion.



A.B. DATA, LTD.: REPRESENTATIVE CASE LIST

Ace Marine Rigging & Supply, Inc. v. Virginia Harbor Services, Inc.
Acevedo v. Lawyers Title Insurance Corporation
In re ACS Shareholders Litigation
In re Adolor Corporation Shareholders Litigation
Desai v. ADT Security Services, Inc.
In re Affiliated Computer Services ERISA Litigation
In re AIG ERISA Litigation
In re AirGate PCS, Inc. Securities Litigation
Akins v. Worley Catastrophe Response, LLC
Alakayak v. All Alaskan Seafoods, Inc.
Allen v. HealthPort Technologies, LLC
Alper v. Warnock Ford, Inc.
Altier v. Worley Catastrophe Response, LLC
In re American Italian Pasta Company Securities Litigation
 (AIPC Settlement)
In re American Italian Pasta Company Securities Litigation
 (Ernst Settlement)
In re Andrx Corporation, Inc.
Arias v. Award Homes, Inc.
Arteaga v. MODA Furniture, Inc.
In re Assicurazioni Generali S.p.A. Holocaust Insurance Litigation
In re Atlas Energy, Inc. Shareholders Litigation
Austrian Banks Holocaust Litigation
Baptista v. Mutual of Omaha Insurance Company
Bauman v. Superior Financial Corp.
In re Bear Stearns Companies, Inc. ERISA Litigation
In re Beazer Homes USA, Inc. ERISA Litigation
In re Beckman Coulter, Inc. Securities Litigation
In re BigBand Networks, Inc. Securities Litigation
In re BISYS Securities Litigation
Black v. Metso Paper USA, Inc.
Blanco v. KeyBank USA, N.A.
Board of Commissioners of the Port of New Orleans v. Virginia Harbor Services Inc.
Bosland v. Warnock Dodge, Inc.
In re BP Prudhoe Bay Royalty Trust Securities Litigation
Bragg v. Bill Heard Chevrolet, Inc.-Plant City
Brattain v. Richmond State Hospital
Brey Corp. v. Life Time Improvements, Inc.
Brieger v. Tellabs, Inc.
Broad St. Partners Fund v. Dods
Brown v. Hayt, Hayt & Landau, LLC
Brumfield v. Countrywide Home Loans, Inc.
Burns v. First American Bank
In re Calpine Corporation ERISA Litigation
Canning v. Concord EFS, Inc.
Capovilla v. Lone Star Technologies, Inc.
In re Cardinal Health, Inc. ERISA Litigation
Carlson v. C.H. Robinson Worldwide, Inc.
Carlson v. State of Alaska, Commercial Fisheries Entry Commission
In re Cbeyond, Inc. Securities Litigation
Cement Masons & Plasterers Joint Pension Trust v. TNS, Inc.
Cerda v. Associates First Capital Corporation
Chao v. Slutsky
Clayton v. Velociti, Inc.
Clearview Imaging, L.L.C. v. Dairyland Insurance Company
Clearview Imaging, L.L.C. v. Mercury Insurance Company of Florida
Clearview Imaging, L.L.C. v. Nationwide Mutual Insurance Company
Clearview Imaging, L.L.C. v. Progressive Consumers Insurance Company
Clemons v. Thompson
In re CNX Gas Corporation Shareholders Litigation
Cohen v. JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A.
Coleman v. Lincoln Wood Products, Inc.
Collins v. American Consumer Shows, Inc.
Commonwealth of Massachusetts v. H&R Block, Inc.
In re Connetics Securities Litigation
In re: The Consumers Trust
Coppess v. Healthways, Inc.
Corsello v. Verizon New York, Inc.
Cotton v. Ferman Management Services Corporation
Cottrell v. Gardner
In re CP Ships Ltd. Securities Litigation
Croxall v. Tampa Hund L.P.
Cruz v. Condor Capital Corporation
Curtis v. Northern Life Insurance Company
In re: DDAVP Indirect Purchaser Antitrust Litigation
DeCario v. Lerner New York, Inc.



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In re Del Monte Foods Company Shareholder Litigation
In re Delphi Financial Group Shareholders Litigation
Deprosio v. The Provident Bank
Di Popolo v. Ramsey Nissan, Inc.
In re Diebold ERISA Litigation
Dishkin v. Tire Kingdom, Inc.
Drury v. Countrywide Home Loans, Inc.
In re Dura Pharmaceuticals, Inc. Securities Litigation
Eisenberger v. Boston Service Company, Inc.
In re Electronic Data Systems Corp. ERISA Litigation
In re Emergent Group, Inc. Shareholder Litigation
In re: Enterprise Rent-A-Car Wage & Hour Employment Practices Litigation
Epstein v. Sears, Roebuck and Co.
Estates of Hampton v. Beverly Enterprises-Arkansas, Inc.
Estep v. Smythe Volvo, Inc.
Evans v. Stewart Title Guaranty Company
Family Open MRI, Incorporated v. Direct General Insurance Company
In re Fannie Mae ERISA Litigation
Fernando v. Neopost USA, Inc.
Fernando v. Priority Mailing Systems
Ferro v. Florida Windstorm Underwriting Association
In re FLAG Telecom Holdings, Ltd. Securities Litigation
Flood v. Dominguez
Kellman v. Forever 21 Retail, Inc.
Francis v. A&E Stores, Inc.
Franco v. Ace Parking Management Inc.
Fray-Witzer v. Metropolitan Antiques, LLC
Fray-Witzer v. Olde Stone Land Survey Company, Inc.
In re Fremont General Corporation Litigation
Friedman v. Rayovac Corporation
Froumy v. Stark & Stark
FW Transportation, Inc. v. Associates Commercial Corporation
In re General Electric Company Securities Litigation
German Forced Labor Compensation Program (GFLCP)
In re Gilead Sciences Securities Litigation
Gilley v. Ernie Haire Ford, Inc.
In re Goodrich Shareholders Litigation
Graham v. Town & Country Disposal of Western Missouri, Inc.
Greenstein v. Nations Title Agency of Florida, Inc.
Griffin v. Flagstar Bancorp, Inc.
Groen v. PolyMedica Corporation

Gulf Coast Injury Center, LLC v. Nationwide Mutual Fire Insurance Company
Hall v. The Children's Place Retail Stores, Inc.
Hamilton v. ATX Services Inc.
Hargrave v. TXU Corp.
Harris v. First Regional Bancorp
Harris v. Koenig
In re Hartford Financial Services Group Inc. ERISA Litigation
Haynes v. Baptist Health
In re: Hearst-Argyle Shareholder Litigation
Hellmers v. Countrywide Home Loans, Inc.
Hess v. Oriole Homes Corp.
Hill v. American Medical Security Life Insurance Company
Hill v. Countrywide Home Loans, Inc.
Holley v. Kitty Hawk, Inc.
In re Holocaust Victim Assets Litigation (Swiss Banks) (HVAP)
Hudson United Bank v. Chase
Hughley v. Maryland Casualty Company
Hunt v. PacifiCare Life and Health Insurance Company
Hutt v. Martha Stewart Living Omnimedia, Inc.
Hutson v. Baptist Health
In re ICG Communications, Inc. Securities Litigation
In re: InfoSonics Securities Litigation
In re ING Groep, N.V. ERISA Litigation
In re International Business Machines Corp. Securities Litigation
International Commission on Holocaust Era Insurance Claims (ICHEIC)
In re Iowa Ready-Mixed Concrete Antitrust Litigation
In re J. Crew Group, Inc. Shareholders Litigation
In re JDS Uniphase Corporation ERISA Litigation
Kalow & Springut, LLP v. Commence Corporation
Kay v. Wells Fargo & Company
In re: King Pharmaceuticals, Inc. Securities Litigation
Kreher v. City of Atlanta, Georgia
Kubota v. Walker
The Lafayette Life Insurance Company v. City of Menasha
In re LDK Solar Securities Litigation
In re Lear Corp. ERISA Litigation
Lehmann v. Ivivi Technologies, Inc.
In re Lehman Brothers Equity/Debt Securities Litigation
In re Lernout & Hauspie Securities Litigation (Directors and FLV Settlements)
In re Lernout & Hauspie Securities Litigation (KPMG Settlement)



Leslie Niederklein v. PCS Edventures!, Inc.
Lilly v. Oneida Ltd. Employee Benefits Admin. Comm.
In re Limelight Networks, Inc. Securities Litigation
Long v. Eschelon Telecom, Inc.
The Louisiana Municipal Police Employees Retirement System v. Deloitte & Touche LLP
Mann & Company, PC v. C-Tech Industries, Inc.
Mann v. Lawyers Title Insurance Corporation
Mantzouris v. Scarritt Motor Group, Inc.
In re Marine Hose Antitrust Litigation (Bridgestone Settlement)
In re Marine Hose Antitrust Litigation (Dunlop Settlement)
In re Marine Hose Antitrust Litigation (Parker Settlement)
In re Marine Hose Antitrust Litigation (Trelleborg Settlement)
In re Marine Hose Antitrust Litigation (Yokohama Settlement)
In re Marsh ERISA Litigation
In re Martek Biosciences Corp. Securities Litigation
Martin v. aaiPharma, Inc.
Martin v. Dun & Bradstreet, Inc.
Martin v. Foster Wheeler Energy Corporation
Mayer v. Administrative Committee of the Smurfit-Stone Container Corporation Retirement Plans
Mayes v. The Geo Group, Inc.
Mayotte v. Associated Bank, N.A.
In re MBNA Corp. Securities Litigation
Meadows v. Clearwater Bay Marketing, LLC
Means v. River Valley Financial Bank
In re Merck & Co. Inc. Vytarin ERISA Litigation
Merrimon v. UNUM Life Insurance Company of America
In re Metavante Technologies, Inc. Shareholder Litigation
Mey v. Herbalife International, Inc.
In re Micromuse, Inc. Securities Litigation
Milford & Ford Associates, Inc. v. Cell-Tek, LLC
Miller v. Weltman, Weinberg & Reis Co., L.P.A.
In re: MK Resources Company Shareholders Litigation
Montalvo v. Tripos, Inc.
Moore v. The Hertz Corporation
In re Morgan Asset Management, Inc.
 (Kelsoe and Weller Settlements)
Morrison v. MoneyGram International, Inc.
 Mortgage Settlement Consumer Restitution Program
 (Foreclosure Restitution Program and Bank of America Victims Program)
In re Motive, Inc. Securities Litigation

Mozenter v. Nalco Holding Company
Mulhern v. MacLeod d/b/a ABC Mortgage Company
In re: National City Corporation Securities, Derivative & ERISA Litigation
The People of the State of New York v. SKS Associates, LLC
Norflet v. John Hancock Life Insurance Company
In re Novamed, Inc. Shareholders Litigation
NSL Capital Management v. Gorman
Nthenge v. Pressler and Pressler, LLP
In re: NX Networks Securities Litigation
Olivo v. Homecomings Financial LLC
Open MRI of Pinellas, Inc. v. Atlanta Casualty Insurance Company
Ori v. Fifth Third Bank and Fiserv, Inc.
In re: Ortiz v. Aurora Health Care, Inc.
Osborn v. EMC Corporation
In re OSI Pharmaceuticals, Inc. Securities Litigation
Otte v. Life Insurance Company of North America
Overby v. Tyco International Ltd.
Ownby v. Citrus County, Florida
In re: Pacific Gateway Exchange, Inc. Securities Litigation
Paliotto v. Johnny Rockets Group, Inc.
In re Par Pharmaceutical Companies, Inc. Shareholders Litigation
In re Par Pharmaceutical Securities Litigation
Parker v. American Medical Security Group, Inc.
Parthiban v. GMAC Mortgage Corporation
Paskowitz v. Ernst & Young, LLP (Motive, Inc.)
Patel v. Baluchi's Indian Restaurant
Payson v. Capital One Home Loans, LLC (FLSA Settlement)
Payson v. Capital One Home Loans, LLC (KWPA Settlement)
Pension Trust Fund for Operating Engineers v. Assisted Living Concepts, Inc.
Pereira v. Foot Locker, Inc.
Perez v. Rent-A-Center, Inc.
Pettway v. Harmon Law Offices, P.C.
In re: PFF Bancorp, Inc. ERISA Litigation
Pickett v. Triad Financial Corporation
In Re: Platinum And Palladium Commodities Litigation
Police and Fire Retirement System of the City of Detroit, Plymouth County Retirement System v. SafeNet, Inc.
Pollitt v. DRS Towing, LLC
In re Potash Antitrust Litigation (II)
Premier Open MRI, LLC v. Progressive American Ins. Co.



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Project HEART—Holocaust Era Asset Restitution Taskforce
Provo v. China Organic Agriculture, Inc.
Puritan Budget Plan, Inc. v. Amstar Insurance Company
Quaak v. Dexia, S.A.
Ragsdale v. SanSai USA, Inc.
Ramirez v. GreenPoint Mortgage Funding, Inc.
Raul v. Western Liberty Bancorp
In re RBC Dain Rauscher Overtime Litigation
In re RCN Corporation ERISA Litigation
In re Ready-Mixed Concrete Antitrust Litigation
In re Reliant Securities Litigation
In re RenaissanceRe Holdings Ltd. Securities Litigation
In re R.H. Donnelley Corp. ERISA Litigation
Rolark v. Lawyers Title Insurance Corporation
Rubin v. MF Global, Ltd.
Rupp v. Thompson
S. Parker Hardware Mfg. Corp. v. AT&T Corp.
Saint Pete MRI v. Hartford
Saint Pete MRI v. Auto Club South Insurance Company
Sam v. White
Santos v. Silver
Scher v. Oxford Health Plans, Inc.
In re Schering-Plough Corp. Enhance ERISA Litigation
In re Schering-Plough Corp. ERISA Litigation
Schmitz v. Liberty Mutual Insurance Company
In re Scottish Re Group Securities Litigation
In re Sears, Roebuck & Co. ERISA Litigation
SEC v. Anderson
SEC v. Gen-See Capital Corporation and Richard S. Piccoli
SEC v. RenaissanceRe Holdings Ltd.
In re SEC v. Rockford Funding Group
In re SEC v. Take-Two Interactive Software, Inc.
SEC v. Tecumseh Holdings Corporation
SEC v. The BISYS Group, Inc.
SEC v. Value Line, Inc.
SEC v. WexTrust Capital, LLC
SEC v. Zomax, Inc.
Serino v. Kenneth Lipper v. PricewaterhouseCoopers, LLP
In re Sexy Hair Concepts, LLC
In re SFBC International Securities & Derivative Litigation
Shane v. Edge
Sheikh v. Maxon Hyundai, Inc.

Silke v. Irwin Mortgage Corporation
Sivsubramanian v. DNC Health Corp.
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In re: Supervalu, Inc. Securities Litigation
In re Suprema Specialties, Inc. Securities Litigation
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In re Ticketmaster Entertainment Shareholder Litigation
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In re VisionAmerica, Inc. Securities Litigation
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Brown v. Wells Fargo & Company

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Young v. Heimbuch

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Zametkin v. Fidelity Management & Research Company

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Zilhaver v. UnitedHealth Group Incorporated

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EXHIBIT C

DETAILED MEDIA PLAN



A.B. Data, Ltd.
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Proposed Notice Program

In re Polyurethane Foam Antitrust Litigation

[MDL Docket No. 2196, Index No. 10-MD-2196 (JZ)]

U.S. District Court, Northern District of Ohio

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Exhibits

Exhibit A	Demographics of People Who Own or Have Purchased Within the Last 12 Months: Upholstered Furniture, Mattress/Box Spring, Crib Mattress, or Wall-to-Wall Carpeting
Exhibit B	Demographics of People Who Have Purchased Within the Last 12 Months: Upholstered Furniture, Mattress/Box Spring, Crib Mattress, or Wall-to-Wall Carpeting
Exhibit C	Media Quintile Analysis, Adults Age 25-69
Exhibit D	Magazine Rankings, Adults Age 25-69
Exhibit E	Listing of <i>Parade</i> Carrier Newspapers

CASE BACKGROUND

CASE BACKGROUND

This Notice Program is submitted by A.B. Data, Ltd. (“A.B. Data”) in connection with *In re Polyurethane Foam Antitrust Litigation* [MDL Docket No. 2196, Index No. 10-MD-2196 (JZ)] in the U.S. District Court for the Northern District of Ohio. This document outlines the efforts that will be made to provide Notice of Pendency to reach consumers.

A proposed Class has been certified in this case regarding the purchase of products containing flexible polyurethane foam (“product”) used in carpet underlay, bedding, and upholstered furniture products, not for resale, that were manufactured, produced, or supplied by Defendants or their unnamed co-conspirators.

A paid-media Notice Program targeting unidentified Class Members is necessary, as direct notice is not an option for this case.

Due to the extended lead times that the publications require for production and distribution of the printed materials, time is of the essence in approving this Notice Plan to meet the deadlines that the Court has in place. Details are provided in the scheduling section.

CLASS DEFINITION

The Class is defined as:

All persons or entities in Alabama, Arizona, California, Colorado, [the] District of Columbia, Florida, Hawaii, Illinois, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Dakota, Tennessee, Vermont, West Virginia, and Wisconsin who purchased products containing flexible polyurethane foam [“product” here defined to include only carpet underlay, bedding, and upholstered furniture products], not for resale, which were manufactured, produced, or supplied by Defendants or their unnamed co-conspirators from January 1, 1999 to the present.

Excluded from the Class are governmental entities, Defendants, their co-conspirators and their representatives, parents, subsidiaries, and affiliates.

NOTICE PROGRAM OVERVIEW

NOTICE PROGRAM OVERVIEW

PROGRAM COMPONENTS

This Notice Program outlines procedures to provide notice of the Class certification of *In re Polyurethane Foam Antitrust Litigation* as a class action, consistent with the requirements set forth in Rule 23.

A.B. Data recommends the following Notice Program:

- Paid Media-Based Notice: After thorough research of the demographics of Class Members, A.B. Data recommends broad paid-media notice consisting of print and Internet vehicles that will reach those Class Members, including:
 - a. Consumer magazines;
 - b. Newspaper supplements;
 - c. Internet banner and text ads on multiple networks, including social media and targeted websites; and
 - d. a news release.

To complement the Notice Program and to ensure Class Members' easy access to updated information, A.B. Data will develop a dedicated informational case website.

NOTICE PROGRAM OVERVIEW

PAID-MEDIA PROGRAM

To reach unidentifiable Class Members, A.B. Data recommends the use of paid and earned media. Paid-media advertising is guaranteed to appear. Paid media also allow for limited control of the content, timing, and positioning of the message. Newspapers, magazines, television, radio, out-of-home media, and the Internet, among other sources, offer paid-media opportunities.

In evaluating the media options to be considered for this case, A.B. Data reviewed the media consumption habits of people who purchased upholstered furniture, bedding (mattress, box spring, crib mattress), and wall-to-wall carpet, and developed a target demographic of Adults Age 25-69.

Based on syndicated data regarding the target audience's media consumption, A.B. Data researched the most appropriate media vehicles that would best deliver potential Class Members and provide them with the opportunity to see and respond to the Notice. A.B. Data reviewed available magazines, newspapers, newspaper supplements, and online advertising for the target audience, as well as compatibility of the editorial. Consumer magazines, newspaper supplements, and Internet advertising will deliver an efficient and effective plan for reaching potential Class Members.

NOTICE PROGRAM OVERVIEW PAID-MEDIA PLACEMENT SUMMARY

The following list provides a summary of A.B. Data's recommended paid-media placements for this case. Detailed information about each publication and its coverage of the target audience in this case appears in the "Paid-Media Placements" section of this plan.

PRINT PUBLICATIONS

Newspaper Supplement

- *Parade*

Consumer Magazines

- *Better Homes and Gardens*
- *National Geographic*
- *People*
- *Reader's Digest*

ONLINE MEDIA

Internet Banner and Text Ads

- Facebook
- Yahoo! Network
- Google

PAID-MEDIA PLANNING METHODOLOGY

PAID-MEDIA PLANNING METHODOLOGY

A.B. Data Notice Programs are developed to reach unidentified Class Members and seek to do the following:

1. Identify the demographics of Class Members through the use of syndicated research to establish a primary target audience;
2. Outline the methodology for selecting the media vehicles recommended and their relationship to product/service purchase and usage by the target audience;
3. Provide results that quantify for the Court the adequacy of the Notice based upon recognized tools of media measurement.

The first steps to developing the paid Notice Program is determining the demographics of the Class Members and defining the target audience. A.B. Data then analyzes media quintile usage data and their ability to provide cost-efficient coverage of the target audience to develop the direction of the Notice Plan, i.e., whether notification is best done through print, online, broadcast, or some other methodology.

Individual media vehicles, both print titles and online websites, are then analyzed and selected based upon their ability to cost-effectively deliver the target audience.

In the development of successful Notice Programs, A.B. Data uses reach and frequency as the standard upon which to measure an effective Notice Plan. Reach and frequency are the two primary measurements used to quantify the delivery of a proposed Notice Plan to a defined target audience. Below are the definitions of these terms as they relate to paid media.

- Reach – expressed as a percentage, a measurement of a target audience that was exposed at least one time to a specific media message or combination of media messages, whether in print, broadcast, online, outdoor, etc., within a given time period.
- Frequency – the estimated average number of opportunities a member of the target audience sees the Notice during the campaign.

These analytical tools, provided by GfK MRI, are used to determine the publications/websites selected and the number of insertions/impressions to be purchased.

GfK MRI (MRI)¹ is the leading supplier of multimedia audience research in the United States. As a nationally accredited research firm, it presents a single-source measurement of major media, products, services, consumer demographic, lifestyle, and psychographic characteristics.

¹ Mediamark's Survey of the American Consumer is the country's largest, most comprehensive, and most reliable consumer and media and product/service usage database. Data from Mediamark's Survey of the American Consumer, conducted continuously since 1979, are used in the majority of media and marketing plans written in the United States. The firm's multidimensional database is the largest and most reliable source for integrated media planning. About 450 U.S. advertising agencies, including 90 of the top 100, subscribe to Mediamark Research along with A.B. Data; more than 200 national marketers access the Mediamark database. GfK MRI offers the most detailed and representative picture of U.S. demographics and lifestyles, including information on usage of nearly 6,000 product and service brands across 550 categories, the magazines and newspapers audiences read, the websites they look at, the television programs they watch, and the radio stations they listen to. MRI has been accredited by the Media Ratings Council ("MRC") since 1988. MRC requires its members to disclose all the methodological aspects, meet MRC standards for rating research, and submit to MRC-designed audits.

TARGET AUDIENCE

TARGET AUDIENCE

To determine the primary target audience of this case, MRI data were examined to determine similar demographic characteristics of U.S. adults who may have purchased products containing flexible polyurethane foam (“product”) used in carpet underlay, bedding, and upholstered furniture products. See Exhibits A and B for the complete results of the syndicated data from MRI on the demographics of people who own or purchased within the past 12 months the following types of products:

Sofa	Sectional sofa	Recliner
Sofa-sleeper	Mattress	Box spring
Crib mattress	Wall-to-wall carpet	

Below is a summary of some of the common demographics of the people who own or purchased within the last 12 months upholstered furniture, mattress or box spring, including crib mattress, or wall-to-wall carpet.

Demographics	Own	Bought Last 12 Months
Gender		
Male	47.95%	45.63%
Female	52.05%	54.37%
Age		
18-24	11.58%	13.64%
25-34	19.19%	21.62%
35-44	18.40%	18.77%
45-54	19.73%	18.33%
55-65	16.10%	15.08%
65+	15.00%	12.56%
Education		
Graduated High School	28.34%	28.47%
Attended/Graduated College	60.0%	60.90%
Household Income		
Under \$20,000	10.21%	10.65%
\$20,000-\$40,000	17.21%	16.05%
\$40,000 - \$60,000	16.62%	16.17%
\$ 60,000 - \$75,000	11.52%	20.39%
\$75,000+	44.52%	45.39%
\$100,000+	29.3%	29.64%
Ethnicity		
Caucasian	81.47%	80.85%
African-American	8.36%	8.66%
Asian	2.86%	2.66%
Other	7.31%	7.83%

Demographics	Own	Bought Last 12 Months
Geographic Location ²		
A Counties ²	40.11%	39.21%
B Counties	30.75%	32.04%
C Counties	15.24%	15.39%
D Counties	13.90%	13.37%
Home Owners	72.38%	67.18%

Based on these data, people who own or who have recently purchased products that contain flexible polyurethane foam are generally people who have or are:

- Adults age 25-54;
- Home owners;
- Attended or graduated from college;
- Having a higher household income;
- Living in suburban or major metropolitan areas.

However, given that this case involves Class Members who have purchased these products over a 15-year period, people up to age 69 are also included as part of the primary target audience.

GEOGRAPHIC CONSIDERATIONS

The Class is numerous and includes all persons or entities that purchased products with flexible polyurethane foam within the following jurisdictions:

Alabama	Arizona	California	Colorado
District of Columbia	Florida	Hawaii	Illinois
Iowa	Kansas	Maine	Massachusetts
Michigan	Minnesota	Mississippi	Missouri
Nebraska	Nevada	New Hampshire	New Mexico
New York	North Carolina	North Dakota	Oregon
Rhode Island	South Dakota	Tennessee	Vermont
West Virginia	Wisconsin		

² A Counties, as defined by A.C. Nielsen Company (“Nielsen”), are all counties belonging to the 25 largest metropolitan areas. These metro areas correspond to the Metropolitan Statistical Area and include the largest cities and consolidated areas in the U.S. B Counties, as defined by Nielsen, are all counties not included under category A that either have a population greater than 150,000 or are in a metro area with a population greater than 150,000 according to the latest census. C counties, as defined by Nielsen, are all counties not included under categories A or B that either have a population greater than 40,000 or are in a metro area with a population greater than 40,000 according to the latest census. D Counties are, essentially, rural counties.

Given that an average of 11.7% of the U.S. population moves annually (U.S. Census Data), a significant percentage of the Class may have moved locally, regionally, or nationally during the past 15 years. In addition, purchases may have been made within the Class jurisdictions and then transported across state lines to states not within the Class.

For these reasons, national media vehicles are recommended to reach potential Class Members.

MEDIA USAGE

Everybody is exposed to and consumes media differently, sometimes with daily changes. However, we all develop patterns to our media consumption. And those patterns become our individual media habits. MRI divides those habits into five categories of media usage, from heavy consumption of media to light users of a media type. These five categories are defined by Quintiles ranked from 1-5, with Quintile 1 representing the heaviest user of a media vehicle to Quintile 5 representing a light user.

The media usage of the target audience in each quintile is expressed as an index. An index of 100 is an average usage of a particular medium. Therefore, an index above 100 indicates a heavier usage of the medium than that of the average adult, and an index below 100 indicates a lighter usage of the medium than that of the average adult.

Media vehicles included in the quintile analysis include newspaper, magazine, Internet, radio, TV, and outdoor.

Radio, while indexing high in the heavy user quintile for this demographic, is not recommended due to the large out-of-pocket cost that it would take to deliver an adequate reach and frequency.

Based on these findings, the most effective way to reach the target audience is through newspapers/newspaper supplements, magazines, and the Internet.

Media	Adults Age 25-69
Magazine	
Quintile 1	103
Quintile 2	100
Newspaper	
Quintile 1	92
Quintile 2	103
Radio	
Quintile 1	104
Quintile 2	105
Television	
Quintile 1	93
Quintile 2	99

Media	Adults Age 25-69
Internet	
Quintile 1	100
Quintile 2	106

Exhibit C includes the entire quintile analysis for Adults Age 25-69.

PAID-MEDIA PLACEMENTS

PRINT-MEDIA ANALYSIS

Print media will provide the most cost-effective method of reaching potential Class Members. Below is a ranking of the largest 15 consumer magazines/newspaper supplements in the U.S. based on their audience of Adults Age 25-69. See Exhibit D for a full listing of the U.S. consumer magazines and newspaper supplements that are included in the 2013 MRI Doublebase Survey.

Print Media Ranked by Adults Age 25-69 Audience		
Ranking	Publication	Adults Age 25-69 Audience (000)
1.	<i>Parade</i>	43,922
2.	<i>People</i>	32,441
3.	<i>Better Homes and Gardens</i>	28,927
4.	<i>USA Weekend</i>	27,492
5.	<i>National Geographic</i>	23,297
6.	<i>AARP the Magazine</i>	22,915
7.	<i>Reader's Digest</i>	17,558
8.	<i>Good Housekeeping</i>	16,759
9.	<i>Women's Day</i>	14,458
10.	<i>Sports Illustrated</i>	14,442
11.	<i>Family Circle</i>	13,554
12.	<i>Time</i>	13,516
13.	<i>Parents</i>	11,859
14.	<i>Southern Living</i>	11,780
15.	<i>Cosmopolitan</i>	11,768

Print media include consumer magazines and newspaper supplements. Most adults read one or more magazines every month. Newspaper supplements are small publications (typically fewer than 30 pages each) that are inserted into weekend or Sunday editions of city newspapers. They have articles that are written for broad appeal and engage readers with their short articles and entertaining editorial content.

For this Notice Program, A.B. Data recommends both newspaper supplements and consumer magazines because of their broad reach of the target audience.

The following magazines and newspaper supplement are recommended:



Circulation:	33,000,000
Audience:	70,658,000
Publication Frequency:	52x a year; weekly on Sunday
Ad Size:	Digest page
Editorial Focus:	<i>Parade's</i> feature stories illuminate the human side of well-known celebrities and celebrate the extraordinary accomplishments of ordinary Americans. <i>Parade</i> feeds America's need for an optimistic voice, providing meaning and importance to our everyday lives. The magazine complements these important features with service-oriented information that readers trust <i>Parade</i> to deliver: health and wellness, food and home, arts and entertainment. See Exhibit E for a complete listing of <i>Parade</i> Carrier Newspapers.



Circulation:	5,500,000
Audience:	23,619,000
Publication Frequency:	12x a year; arrives in home 1st of month
Ad Size:	Digest page
Editorial Focus:	<i>Reader's Digest</i> simplifies and enriches readers' lives with expertly curated information that is concise, simple, and easily accessible. The magazine takes an optimistic approach that uniquely reflects and understands its readers. The content is real, objective, inspiring, actionable, and important to its readers today. <i>Reader's Digest</i> delivers specifically tailored lifestyle editorial that includes health, food, finance, travel, and savings to a receptive audience in a relevant environment.



Circulation:	7,600,000
Audience:	34,981,000
Publication Frequency:	12 monthly; available midmonth
Ad Size:	1/3 page
Editorial Focus:	Provides home-service information for people who have a serious interest in their homes. Covers in-depth home and family subjects like food and appliances, building and repairs, decorating, family money management, gardening, travel, health, family entertainment, and more.

People

Circulation:	3,450,000
Audience:	35,884,000
Publication Frequency:	52x; weekly on Friday
Ad Size:	1/3 page
Editorial Focus:	Contains insightful, compassionate, and entertaining coverage of the most intriguing people in our culture, from extraordinary people doing the ordinary to ordinary people caught up in extraordinary circumstances. By revealing the human side to every story, <i>People</i> connects readers to their world.



Circulation:	3,500,000
Audience:	30,632,000
Publication Frequency:	12x monthly
Ad Size:	Digest page
Editorial Focus:	<i>National Geographic</i> magazine is the global leader in empowering people to navigate the world, providing authoritative, unbiased content that addresses today's complex issues, while uncovering the wonders of our time. Each issue captivates millions of curious readers with award-winning photography and world-class reporting that inspire them to make informed decisions and effect positive change.

ONLINE/DIGITAL MEDIA ANALYSIS

MRI provides data on Internet usage by asking survey respondents about their online usage during the 30 days prior. According to the 2013 MRI survey, 79% of Adults Age 25-69 used the Internet during the last 30 days.

Because the Internet is such an integral part of the lives of Adults Age 25-69, it is recommended that online media support this Notice Plan with a significant presence over a four-week campaign.

A.B. Data recommends placing ads on a variety of websites, enabling maximum exposure opportunities to reach the target audience of Adults 25-69. Additionally, websites with audiences that consist highly of the specific target audiences were also selected. (Delivery of Internet impressions to specific sites and categories is subject to change due to availability at the time A.B. Data negotiates and purchases the media.)

A.B. Data recommends the following social media site and networks:

- Facebook is recommended because it will allow specific geographic targeting. We can purchase impressions to deliver additional coverage to the case jurisdictions so the target can be reached with minimal waste.
- Google's Content Network of network text ads is recommended because we can specifically purchase the types of relevant content where we want the text ads to appear. For example, we can select websites that feature remodeling, redecorating, furniture, linens, moving, seniors, parents, etc.
- The Yahoo! Network is recommended because of its extremely large network of sites, such as AOL, Microsoft, and Flickr. Yahoo! is a leading Internet brand with a network of integrated services providing users with entertainment, email, and other social platforms.

Below is a list of the networks recommended, along with their respective numbers of campaign impressions.

Network	Ad/Banner Sizes	Impressions
Facebook	100 x 72 banners	10,000,000
Google Content Network	Network text ads	45,000,000
Yahoo! Network	Banner and text ads	61,000,000

EARNED MEDIA

In addition to the Notice Plan involving print publications and digital media, it is recommended that a news release be run via PR Newswire. The Notice will be distributed via PR Newswire to 5,600 newsrooms, both print and broadcast, across the U.S., plus 5,900 websites. Additionally, the Notice will be sent to any trade publications that are relevant to the industry.

NATIONAL MEDIA DELIVERY

The paid-media program outlined in this plan provides Class Members with multiple exposure opportunities to the Case message through the media vehicles carrying the Notice. The recommended program delivers the following estimated reach and frequency measurements to the target audience, as defined by the 2013 Doublebase Study from GfK MRI:

Print Reach:	51.77%
Print and Online Reach:	77.44%
Average Frequency:	1.82 times
Gross Impressions:	247,659,000

PUBLICATION NOTICE

The Federal Rules of Civil Procedure require notices in class action cases to be written in “plain, easily understood language.” This process will be utilized in developing the Notice for *In re Polyurethane Foam Antitrust Litigation*.

A.B. Data is committed to adhering to the easily-understood-language requirement of Rule 23(c)(2) and Rule 23(b)(3).

The plain-language Publication Notice that will be developed for this program will be designed to be seen easily by potential Class Members with a large, bold headline. The plain, easily understood language in the text of the Notice will offer potential Class Members the opportunity to read it at their leisure, helping ensure they understand the subject of the case, the steps they must take to join the Class, and the legal rights of all Class Members.

Each printed Publication Notice will prominently display a case website address, a toll-free telephone number, and a mailing address so that potential Class Members may review the detailed Notice and other information available on the case.

SCHEDULING

SCHEDULING

The recommended Notice Program is designed to run over a four-week (30-day) time period. Notice programs that target consumers have run with this kind of scheduling protocol in dozens of cases during the past 10+ years. We recommend that this Notice Program should follow the scheduling precedent that has been set.

The recommended timeline and scheduling is shown below. The first space closing is May 1, 2014, with materials due May 8, 2014.

Poly Foam Notice Program: Proposed Timeline 2014

	JUNE					JULY				AUGUST			
<i>Publication</i>	2	9	16	23	30	7	14	21	28	4	11	18	25
<i>Better Homes and Gardens</i> issue date August On Sale 7/15 Space Close 5/15													
<i>Reader's Digest</i> issue date August On Sale 7/15 Space Close 5/23													
<i>Parade</i> Issue date June 22 In Newspapers 6/22 space close 5/23			6/22										
<i>People</i> Issue Date 7/7/14 On Sale 6/27 Space close 6/2				6/27									
<i>National Geographic</i> Issue Date July On Sale 6/24 Space close 5/1													
Internet Banners/Text Ads Online Dates 6/23 - 7/22 Space Close 6/2													
PR Newswire				6/23									

NOTICE PLAN COST

The cost to produce and implement the recommended Notice Program, as described in this document, is \$860,000. This includes the print and Internet plans and the news release to be carried via PR Newswire.

EXHIBIT A:

NOW OWNS HOUSEHOLD FURNISHING: BIG
TICKET ITEMS: SOFA/SECTIONAL,
RECLINER, SOFA-BED CONVERTIBLE,
OTHER UPHOLSTERED FURNITURE,
MATTRESS, BOX SPRING, CRIB MATTRESS,
WALL-TO-WALL CARPET

Exhibit A**Demographic Data**

Now owns Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
All	143819	61.82	100.00	100
Men	68956	61.24	47.95	99
Women	74864	62.35	52.05	101
Parents	50919	69.02	35.40	112
Educ: graduated college plus	46390	71.85	32.26	116
Educ: attended college	42279	64.05	29.40	104
Educ: graduated high school	40753	57.50	28.34	93
Educ: did not graduate HS	14398	46.12	10.01	75
Educ: post graduate	16410	73.26	11.41	119
Educ: no college	55150	54.02	38.35	87
Age 18-24	16652	55.86	11.58	90
Age 25-34	27594	66.39	19.19	107
Age 35-44	26462	65.82	18.40	106
Age 45-54	28382	64.09	19.73	104
Age 55-64	23162	62.63	16.10	101
Age 65+	21569	54.18	15.00	88
Adults 18-34	44245	61.99	30.76	100
Adults 18-49	85063	63.62	59.15	103
Adults 25-54	82437	65.40	57.32	106
Men 18-34	21062	58.63	14.64	95
Men 18-49	40915	61.40	28.45	99
Men 25-54	39636	63.58	27.56	103
Women 18-34	23183	65.40	16.12	106
Women 18-49	44148	65.81	30.70	106
Women 25-54	42801	67.18	29.76	109
Employment: working full time	74034	66.36	51.48	107
Employment: working part time	17205	61.87	11.96	100
Employment: not working	52581	56.37	36.56	91
Occupation: professional and related occupations	22123	71.70	15.38	116
Occupation: management, business and financial operations	16285	73.21	11.32	118
Occupation: sales and office occupations	21219	65.67	14.75	106
Occupation: natural resources, construction and maintenance occup.	7837	61.55	5.45	100
Occupation: other employed	23775	57.65	16.53	93
IEI \$200,000 or over	1606	73.36	1.12	119
IEI \$150,000-199,999	1794	73.99	1.25	120
IEI \$100,000-149,999	6493	75.62	4.51	122
IEI \$75,000-99,999	8478	73.00	5.89	118
IEI \$60,000-74,999	9471	72.97	6.59	118
IEI \$50,000-59,999	8640	70.16	6.01	113
IEI \$40,000-49,999	11445	68.91	7.96	111
IEI \$30,000-39,999	12333	65.02	8.58	105
IEI \$20,000-29,999	12417	61.28	8.63	99
IEI <\$20,000	18562	55.52	12.91	90
Wage earner status: not employed	52581	56.37	36.56	91

Exhibit A**Demographic Data**

Now owns Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
Wage earner status: sole earner	25122	61.56	17.47	100
Wage earner status: primary earner	31243	66.44	21.72	107
Wage earner status: sec earner	34874	67.66	24.25	109
HHI \$200,000 or over	7620	71.69	5.30	116
HHI \$150,000-199,999	9742	70.42	6.77	114
HHI \$100,000-149,999	24773	71.67	17.22	116
HHI \$75,000-99,999	21900	70.94	15.23	115
HHI \$60,000-74,999	16574	66.13	11.52	107
HHI \$50,000-59,999	12051	63.54	8.38	103
HHI \$40,000-49,999	11847	58.12	8.24	94
HHI \$30,000-39,999	12494	55.68	8.69	90
HHI \$20,000-29,999	12130	52.44	8.43	85
HHI <\$20,000	14688	44.82	10.21	73
HHI \$150,000+	17362	70.97	12.07	115
HHI \$100,000+	42135	71.38	29.30	115
HHI \$75,000+	64035	71.23	44.52	115
HHI \$60,000+	80608	70.12	56.05	113
HHI \$50,000+	92659	69.19	64.43	112
HHI \$40,000+	104506	67.72	72.66	110
HHI \$30,000+	117001	66.19	81.35	107
Total Net Worth of all HH members: under \$100,000	37535	51.69	26.10	84
Total Net Worth of all HH members: \$100,000-249,999	34899	62.31	24.27	101
Total Net Worth of all HH members: \$250,000-499,999	39685	67.73	27.59	110
Total Net Worth of all HH members: \$500,000-999,999	21030	69.83	14.62	113
Total Net Worth of all HH members: \$1,000,000 or more	10670	69.61	7.42	113
Census Region: North East	26068	61.33	18.13	99
Census Region: South	51007	58.90	35.47	95
Census Region: Midwest	33913	66.95	23.58	108
Census Region: West	32832	62.06	22.83	100
Mktg Region: New England	7080	63.67	4.92	103
Mktg Region: Mid Atlantic	21842	60.64	15.19	98
Mktg Region: East Central	18147	63.69	12.62	103
Mktg Region: West Central	23458	67.92	16.31	110
Mktg Region: Southeast	28263	58.97	19.65	95
Mktg Region: Southwest	16592	58.75	11.54	95
Mktg Region: Pacific	28436	61.40	19.77	99
Mediamarkets: Top 5	28266	58.34	19.65	94
Mediamarkets: Next 5	14654	62.00	10.19	100
Mediamarkets: New York	9099	56.31	6.33	91
Mediamarkets: Los Angeles	7825	57.93	5.44	94
Mediamarkets: Chicago	4365	59.76	3.04	97
Metropolitan CBSA	119826	61.36	83.32	99

Exhibit A**Demographic Data**

Now owns Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
Micropolitan CBSA/unassigned	23994	64.19	16.68	104
County size A	57687	60.30	40.11	98
County size B	44222	62.14	30.75	101
County size C	21912	64.57	15.24	104
County size D	19998	62.71	13.90	101
Marital status: never married	34752	54.76	24.16	89
Marital status: now married	85273	68.27	59.29	110
Marital status: legally separated/widowed/divorced	23794	53.74	16.54	87
Marital status: engaged	6908	60.13	4.80	97
HH size: 1	17367	53.06	12.08	86
HH size: 2	45900	62.23	31.91	101
HH size: 3-4	55461	64.29	38.56	104
HH size: 5+	25092	62.88	17.45	102
Children: any	62074	66.44	43.16	107
Children: 1	25477	65.66	17.71	106
Children: 2	21990	67.26	15.29	109
Children: 3+	14607	66.57	10.16	108
Child age: <12 months	7938	80.39	5.52	130
Child age: 12-23 months	6445	76.77	4.48	124
Child age: <2 years	14006	78.90	9.74	128
Child age: <6 years	30909	70.79	21.49	115
Child age: 2-5 years	23014	68.39	16.00	111
Child age: 6-11 years	27089	63.89	18.84	103
Child age: 12-17 years	28602	63.36	19.89	102
Life cycle: resp 18-34 1 pers HH	2902	59.40	2.02	96
Life cycle: resp 18-34 married no kids	3769	69.96	2.62	113
Life cycle: resp 18-34 married yng chld <6	11269	79.63	7.84	129
Life cycle: resp 18-34 married yng chld 6-17	1781	61.86	1.24	100
Life cycle: balance of resp 18-34	24524	55.65	17.05	90
Life cycle: resp 35-49 1 pers HH	2981	56.92	2.07	92
Life cycle: resp 35-49 married no kids	5983	67.73	4.16	110
Life cycle: resp 35-49 married yng chld <6	8754	74.96	6.09	121
Life cycle: resp 35-49 married yng chld 6-11	8263	68.25	5.75	110
Life cycle: resp 35-49 married yng chld 12-17	5827	69.54	4.05	112
Life cycle: balance of resp 35-49	9010	55.94	6.26	90
Life cycle: resp 50+ 1 pers HH	10973	50.35	7.63	81
Life cycle: resp 50+ married no kids	32766	64.03	22.78	104
Life cycle: resp 50+ married w/kids	6831	66.43	4.75	107
Life cycle: balance of resp 50+	8186	52.17	5.69	84
Years at pres address: <1 year	22325	59.02	15.52	95
Years at pres address: 1-4 years	37494	61.48	26.07	99
Years at pres address: 5+ years	84000	62.76	58.41	102
Home owned	104095	65.89	72.38	107
Home value: \$500,000+	9731	70.03	6.77	113
Home value: \$200,000-499,999	40271	68.62	28.00	111

Exhibit A**Demographic Data**

Now owns Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
Home value: \$100,000-199,999	36185	66.49	25.16	108
Home value: \$50,000-99,999	12836	59.21	8.93	96
Home value: <\$50,000	5072	54.60	3.53	88
Race: White	117165	66.34	81.47	107
Race: Black/African American	12017	43.41	8.36	70
Race: American Indian or Alaska Native	1531	59.23	1.06	96
Race: Asian	4109	57.65	2.86	93
Race: Other	11328	50.09	7.88	81
Race: White only	115391	66.45	80.23	108
Race: Black/African American only	11420	42.97	7.94	70
Race: Other race/Multiple classifications	17008	52.42	11.83	85
Spanish spoken in home (most often or other)	18508	52.25	12.87	85
Hispanic Respondent personally speaks only english at home	2922	59.53	2.03	96
Hispanic Respondent personally speaks mostly english, but some spanish at home	4525	55.76	3.15	90
Hispanic Respondent personally speaks only spanish at home	3632	38.36	2.53	62
Hispanic Respondent personally speaks mostly spanish, but some english at home	4583	50.34	3.19	81
Hispanic Respondent personally speaks both english and spanish equally at home	884	73.23	0.61	118
Hispanic Respondent personally speaks other language at home *	162	48.48	0.11	78
Spanish, Hispanic or Latino Origin or Descent	16707	50.42	11.62	82
Pet owner	88445	65.62	61.50	106
Dog owner	68641	65.62	47.73	106
Cat owner	38073	67.06	26.47	108
Have a landline telephone	93238	62.61	64.83	101
Cell phone only (no landline) in HH	50130	60.47	34.86	98
Landline only (no cell phone) in HH	4373	49.07	3.04	79
Generations: Millennials (b.1977-1994)	46787	62.22	32.53	101
Generations: GenXers (b.1965-1976)	32481	65.26	22.58	106
Generations: Boomers (b. 1946-1964)	46134	63.08	32.08	102
Generations: Early Boomers (b. 1946-1955)	21232	62.49	14.76	101
Generations: Late Boomers (b. 1956-1964)	24902	63.59	17.31	103
Generations: Pre-Boomers (b. before 1946)	18418	53.30	12.81	86
Magazine Quintile I	29271	63.00	20.35	102
Magazine Quintile II	30860	66.47	21.46	108
Magazine Quintile III	29847	64.10	20.75	104
Magazine Quintile IV	28423	61.00	19.76	99
Magazine Quintile V	25418	54.53	17.67	88
Newspaper Quintile I	29149	62.81	20.27	102
Newspaper Quintile II	29040	62.29	20.19	101
Newspaper Quintile III	29689	63.88	20.64	103
Newspaper Quintile IV	27953	60.15	19.44	97
Newspaper Quintile V	27988	59.95	19.46	97
Radio Quintile I	28333	60.82	19.70	98

Exhibit A**Demographic Data**

Now owns Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
Radio Quintile II	30041	64.62	20.89	105
Radio Quintile III	30186	64.91	20.99	105
Radio Quintile IV	29413	63.10	20.45	102
Radio Quintile V	25847	55.63	17.97	90
TV (Total) Quintile I	25210	54.34	17.53	88
TV (Total) Quintile II	28788	61.90	20.02	100
TV (Total) Quintile III	30025	64.55	20.88	104
TV (Total) Quintile IV	30409	65.21	21.14	105
TV (Total) Quintile V	29387	63.05	20.43	102
Internet Quintile I (Heavy)	29710	63.74	20.66	103
Internet Quintile II	31561	68.05	21.95	110
Internet Quintile III	31262	67.02	21.74	108
Internet Quintile IV	28239	60.82	19.63	98
Internet Quintile V (Light)	23047	49.47	16.03	80
Outdoor Quintile I	31773	68.43	22.09	111
Outdoor Quintile II	30467	65.66	21.18	106
Outdoor Quintile III	29795	64.11	20.72	104
Outdoor Quintile IV	27264	58.65	18.96	95
Outdoor Quintile V	24520	52.32	17.05	85
TV (Primetime) Quintile I	27198	58.69	18.91	95
TV (Primetime) Quintile II	29358	63.30	20.41	102
TV (Primetime) Quintile III	29795	63.93	20.72	103
TV (Primetime) Quintile IV	29076	62.23	20.22	101
TV (Primetime) Quintile V	28392	60.91	19.74	99
TV (Daytime) Tercile I	12565	52.11	8.74	84
TV (Daytime) Tercile II	13541	56.09	9.42	91
TV (Daytime) Tercile III	14769	60.97	10.27	99
Have Internet access at home, using a computer	120188	65.35	83.57	106
Internet Service Providers (to HH): America Online (AOL)	1424	70.12	0.99	113
Internet Service Providers (to HH): AT&T	19600	64.05	13.63	104
Internet Service Providers (to HH): Cablevision (Optimum)	3501	60.88	2.43	98
Internet Service Providers (to HH): CenturyLink	6143	72.10	4.27	117
Internet Service Providers (to HH): Charter	5692	67.12	3.96	109
Internet Service Providers (to HH): Comcast/Xfinity	24050	65.18	16.72	105
Internet Service Providers (to HH): Cox	5452	64.82	3.79	105
Internet Service Providers (to HH): Earthlink	425	65.35	0.30	106
Internet Service Providers (to HH): Net Zero/Juno	234	56.43	0.16	91
Internet Service Providers (to HH): Road Runner (Time Warner Cable)	12008	65.95	8.35	107
Internet Service Providers (to HH): Verizon	14142	65.18	9.83	105
Internet Service Providers (to HH): Any Service	119762	65.44	83.27	106
Looked at/used Internet using a computer in the last 30 days: At home	113798	66.25	79.13	107

Exhibit A**Demographic Data**

Now owns Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
Looked at/used Internet using a computer in the last 30 days: At work	60759	70.10	42.25	113
Looked at/used Internet using a computer in the last 30 days: At school or library	14874	60.56	10.34	98
Looked at/used Internet using a computer in the last 30 days: Another place	36360	65.95	25.28	107
Looked at/used Internet using a computer in the last 30 days: Any Internet Usage	121627	65.50	84.57	106
Used Wi-Fi or wireless connection using a computer outside of home/last 30 days	41189	67.52	28.64	109
Devices used to use the Internet/last 30 days: Desktop computer	83119	66.73	57.79	108
Devices used to use the Internet/last 30 days: Laptop or Netbook computer	80782	67.61	56.17	109
Devices used to use the Internet/last 30 days: Any computer	115905	66.05	80.59	107
Devices used to use the Internet/last 30 days: iPad or other Tablet	24894	70.19	17.31	114
Devices used to use the Internet/last 30 days: Cellphone or Smartphone	71645	66.25	49.82	107
Devices used to use the Internet/last 30 days: E-reader	6242	72.36	4.34	117
Devices used to use the Internet/last 30 days: iPod or other MP3 Player	8379	66.16	5.83	107
Devices used to use the Internet/last 30 days: Video game console	10410	65.53	7.24	106
Visited a chat room/past 30 days	7058	57.61	4.91	93
Used e-mail/past 30 days	108842	67.07	75.68	108
Used instant messenger/past 30 days	67824	64.79	47.16	105
Participated in on-line dating/past 30 days	2229	60.87	1.55	98
Made a purchase for personal use (on the Internet)/past 30 days	64926	70.94	45.14	115
Made a purchase for business use (on the Internet)/past 30 days	17669	72.08	12.29	117
Made personal or business travel plans online/past 30 days	29274	71.48	20.35	116
Played games online/past 30 days	39331	63.99	27.35	104
Downloaded a video game/past 30 days	11988	61.89	8.34	100
Used on-line gambling site/past 30 days	1543	58.28	1.07	94
Obtained financial information online/past 30 days	47359	70.74	32.93	114
Tracked investments/Traded stocks, bonds or mutual funds online/past 30 days	18374	72.01	12.78	116
Paid bills online/past 30 days	67772	68.74	47.12	111
Obtained the latest news/current events online/past 30 days	70340	69.58	48.91	113
Obtained sports news/information online/past 30 days	44501	67.21	30.94	109
Obtained information for new/used car purchase online/past 30 days	17087	67.61	11.88	109
Obtained information about real estate online/past 30 days	19376	71.98	13.47	116
Obtained medical information online/past 30	34660	69.27	24.10	112

Exhibit A**Demographic Data**

Now owns Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
Obtained childcare or parenting information online/past 30 days	8412	74.16	5.85	120
Obtained information about entertainment or celebrities	37385	67.59	25.99	109
Looked for employment online/past 30 days	22083	61.43	15.35	99
Looked for recipes online/past 30 days	50119	69.83	34.85	113
Took an online class or course/past 30 days	9645	63.81	6.71	103
Visited a TV network or TV show's website/past 30 days	30351	68.19	21.10	110
Looked at TV listings online/past 30 days	13963	67.99	9.71	110
Looked up movie listings or showtimes online/past 30 days	32866	66.75	22.85	108
Listened to radio on the Internet (NET)/past 30 days	33496	66.71	23.29	108
Visited a radio station, radio program or radio personality website/past 30 days	10117	66.66	7.03	108
Downloaded music/past 30 days	31969	63.37	22.23	103
Downloaded podcasts/podcasting/past 30 days	5183	65.26	3.60	106
Downloaded a TV program/past 30 days	6062	65.32	4.21	106
Watched a TV program online/past 30 days	19750	65.60	13.73	106
Downloaded a movie/past 30 days	9215	63.02	6.41	102
Watched a movie online/past 30 days	19325	64.28	13.44	104
Watched other online video/past 30 days	19802	65.14	13.77	105
Visited online blogs/past 30 days	19148	70.09	13.31	113
Wrote online blog/past 30 days	4269	64.08	2.97	104
Posted a comment or review on a blog, online forum, message or bulletin/past 30 days	16852	66.88	11.72	108
Made a phone call online/past 30 days	20950	65.29	14.57	106
Uploaded or added video to website/past 30	8052	62.50	5.60	101
Shared photos through Internet website/past 30 days	42785	69.09	29.75	112
Sent an electronic greeting card/past 30 days	7595	66.59	5.28	108
Total time spent yesterday using the Internet (does not include email or IM): 10+ hours	3924	61.75	2.73	100
Total time spent yesterday using the Internet (does not include email or IM): 5-10 hours	13389	64.36	9.31	104
Total time spent yesterday using the Internet (does not include email or IM): 2-5 hours	28482	66.38	19.80	107
Total time spent yesterday using the Internet (does not include email or IM): 1-2 hours	26604	67.30	18.50	109
Total time spent yesterday using the Internet (does not include email or IM): 1/2-1 hour	20282	67.41	14.10	109
Total time spent yesterday using the Internet (does not include email or IM): less than 1/2	16127	64.32	11.21	104
Total time spent last Saturday using the Internet (does not include email or IM): 10+ hours	2222	57.50	1.55	93
Total time spent last Saturday using the Internet (does not include email or IM): 5-10 hours	7929	59.27	5.51	96
Total time spent last Saturday using the Internet (does not include email or IM): 2-5 hours	23119	64.55	16.07	104
Total time spent last Saturday using the Internet (does not include email or IM): 1-2 hours	24889	68.46	17.31	111

Exhibit A**Demographic Data**

Now owns Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
Total time spent last Saturday using the Internet (does not include email or IM): 1/2-1 hour	20211	68.73	14.05	111
Total time spent last Saturday using the Internet (does not include email or IM): less than 1/2	15970	66.03	11.10	107
Total time spent last Sunday using the Internet (does not include email or IM): 10+ hours	1973	59.97	1.37	97
Total time spent last Sunday using the Internet (does not include email or IM): 5-10 hours	7214	60.03	5.02	97
Total time spent last Sunday using the Internet (does not include email or IM): 2-5 hours	21050	65.59	14.64	106
Total time spent last Sunday using the Internet (does not include email or IM): 1-2 hours	23737	68.12	16.50	110
Total time spent last Sunday using the Internet (does not include email or IM): 1/2-1 hour	19612	68.19	13.64	110
Total time spent last Sunday using the Internet (does not include email or IM): less than 1/2	16814	67.24	11.69	109
Website or search engines used/yesterday: AOL/AOL.com	6921	66.07	4.81	107
Website or search engines used/yesterday: Ask.com	3586	69.01	2.49	112
Website or search engines used/yesterday: Bing.com	12870	69.96	8.95	113
Website or search engines used/yesterday: Excite.com	195	69.21	0.14	112
Website or search engines used/yesterday: Google.com	86329	67.18	60.03	109
Website or search engines used/yesterday: Yahoo.com	35891	64.75	24.96	105
Website or search engines used/last 30 days: AOL/AOL.com	9964	64.84	6.93	105
Website or search engines used/last 30 days: Ask.com	11204	68.18	7.79	110
Website or search engines used/last 30 days: Bing.com	26779	69.50	18.62	112
Website or search engines used/last 30 days: Excite.com	444	62.45	0.31	101
Website or search engines used/last 30 days: Google.com	109679	66.39	76.26	107
Website or search engines used/last 30 days: Yahoo.com	54597	64.50	37.96	104
Instant Messenger (IM) used/last 30 days: AIM/AOL Instant Messenger	4701	63.72	3.27	103
Instant Messenger (IM) used/last 30 days: Facebook	49956	64.21	34.73	104
Instant Messenger (IM) used/last 30 days: Google Talk/Gmail Chat	8362	65.78	5.81	106
Instant Messenger (IM) used/last 30 days: MySpace	1258	57.61	0.87	93
Instant Messenger (IM) used/last 30 days: Skype (measured separately as Skype and Windows Live Messenger in Waves 65-68)	16564	65.72	11.52	106
Instant Messenger (IM) used/last 30 days: Yahoo! Messenger	9098	56.83	6.33	92
E-mail used/yesterday: AOL Mail	8721	67.33	6.06	109
E-mail used/yesterday: Gmail	32008	67.48	22.26	109

Exhibit A**Demographic Data**

Now owns Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
E-mail used/yesterday: Outlook.com (measured as Windows Live Hotmail in Waves 65-68)	12127	66.79	8.43	108
E-mail used/yesterday: Yahoo! Mail	32508	64.87	22.60	105
E-mail used/last 30 days: AOL Mail	11639	66.58	8.09	108
E-mail used/last 30 days: Gmail	39869	67.42	27.72	109
E-mail used/last 30 days: Outlook.com (measured as Windows Live Hotmail in Waves 65-68)	15805	65.80	10.99	106
E-mail used/last 30 days: Yahoo! Mail	42782	64.57	29.75	104
ABC.com/visited in last 30 days	7138	70.09	4.96	113
CBS.com/visited in last 30 days	5297	67.16	3.68	109
Disney.com/visited in last 30 days	3837	69.11	2.67	112
FarmVille/visited in last 30 days	1799	60.91	1.25	99
Fox.com/visited in last 30 days	6592	69.06	4.58	112
Hulu.com/visited in last 30 days	9078	67.16	6.31	109
IMDb.com/visited in last 30 days	9451	70.90	6.57	115
iTunes.com/visited in last 30 days	21149	68.03	14.71	110
iVillage.com/visited in last 30 days	316	59.83	0.22	97
Moviefone.com/visited in last 30 days	2085	65.18	1.45	105
MSN Movies/visited in last 30 days	878	56.83	0.61	92
MTV.com/visited in last 30 days	2243	56.23	1.56	91
NBC.com/visited in last 30 days	5444	70.23	3.79	114
Pandora.com/visited in last 30 days	22454	67.33	15.61	109
PBS.org/visited in last 30 days	4138	71.77	2.88	116
Ticketmaster.com/visited in last 30 days	7439	68.79	5.17	111
Yahoo! Movies/visited in last 30 days	3425	58.50	2.38	95
About.com/visited in last 30 days	5070	74.35	3.53	120
Answers.com/WikiAnswers/visited in last 30 days	8523	68.17	5.93	110
Bankrate.com/visited in last 30 days	1617	69.38	1.12	112
eHow.com/visited in last 30 days	9104	72.27	6.33	117
Superpages.com/visited in last 30 days	829	73.30	0.58	119
WebMD.com/visited in last 30 days	20753	72.90	14.43	118
WhitePages.com/visited in last 30 days	8810	74.77	6.13	121
Wikipedia.org/visited in last 30 days	31321	70.86	21.78	115
Yahoo! Answers/visited in last 30 days	9739	66.44	6.77	107
Yellowpages.com (YP.com)/visited in last 30 days	10903	68.71	7.58	111
CareerBuilder.com/visited in last 30 days	8330	62.88	5.79	102
Monster.com/visited in last 30 days	6826	64.54	4.75	104
ABCNews.com/visited in last 30 days	6268	66.80	4.36	108
CBSNews.com/visited in last 30 days	4029	67.63	2.80	109
CNN.com/visited in last 30 days	16200	68.93	11.26	112
FOXNews.com/visited in last 30 days	13408	69.66	9.32	113
Huffington Post.com/visited in last 30 days	8961	71.14	6.23	115
NBCNews.com (measured as MSNBC.com in waves 65-67)/visited in last 30 days	10235	70.94	7.12	115
NYTimes.com/visited in last 30 days	11014	66.64	7.66	108
USAToday.com/visited in last 30 days	8172	67.28	5.68	109

Exhibit A**Demographic Data**

Now owns Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
WSJ.com/visited in last 30 days	6858	67.29	4.77	109
Yahoo! News/visited in last 30 days	21133	66.33	14.69	107
Amazon.com/visited in last 30 days	42580	70.48	29.61	114
Coupons.com/visited in last 30 days	5563	71.31	3.87	115
eBay.com/visited in last 30 days	28046	69.62	19.50	113
Groupon.com/visited in last 30 days	12721	73.78	8.85	119
Overstock.com/visited in last 30 days	9441	72.14	6.56	117
ShopAtHome.com/visited in last 30 days	810	61.14	0.56	99
Univision.com/visited in last 30 days	2028	52.35	1.41	85
Yahoo! en Espanol/visited in last 30 days	831	47.48	0.58	77
any spanish language website/visited in last 30 days	2984	51.22	2.08	83
AOL.SportingNews.com/visited in last 30 days	1037	64.17	0.72	104
CBSSports.com/visited in last 30 days	3806	71.67	2.65	116
ESPN.com/visited in last 30 days	20900	65.98	14.53	107
FOXSports.com/visited in last 30 days	6326	66.40	4.40	107
MLB.com/visited in last 30 days	5439	69.82	3.78	113
NASCAR.com/visited in last 30 days	4039	73.48	2.81	119
NBA.com/visited in last 30 days	4265	56.17	2.97	91
NBC Sports website/visited in last 30 days	2918	63.81	2.03	103
NFL.com/visited in last 30 days	9766	64.01	6.79	104
WWE.com/visited last 30 days	1578	54.99	1.10	89
Yahoo! Sports/visited in last 30 days	9465	64.77	6.58	105
CNET.com/visited in last 30 days	4866	71.42	3.38	116
Bings Maps/visited in last 30 days	4326	71.28	3.01	115
CheapTickets.com/visited in last 30 days	6503	65.44	4.52	106
Expedia.com/visited in last 30 days	12435	71.29	8.65	115
Hotels.com/visited in last 30 days	6934	68.48	4.82	111
Hotwire.com/visited in last 30 days	5427	67.76	3.77	110
MapQuest.com/visited in last 30 days	27572	70.26	19.17	114
Maps.google.com (Google Maps)/visited in last 30 days	32410	70.98	22.54	115
Orbitz.com/visited in last 30 days	7777	72.33	5.41	117
Priceline.com/visited in last 30 days	7450	68.61	5.18	111
Travelocity.com/visited in last 30 days	9770	71.45	6.79	116
TripAdvisor.com/visited in last 30 days	5424	75.22	3.77	122
Yahoo! Maps/visited in last 30 days	11301	64.16	7.86	104
AccuWeather.com/visited in last 30 days	11864	71.12	8.25	115
Weather.com/visited in last 30 days	42311	69.51	29.42	112
WeatherBug.com/visited in last 30 days	6962	67.86	4.84	110
Facebook/visited in last 30 days	78225	65.40	54.39	106
Flickr/visited in last 30 days	3383	70.16	2.35	113
Foursquare/visited in last 30 days	1220	65.94	0.85	107
LinkedIn/visited in last 30 days	13398	73.46	9.32	119
MySpace/visited in last 30 days	2865	60.35	1.99	98
Photobucket/visited in last 30 days	3488	64.25	2.43	104

Exhibit A**Demographic Data**

Now owns Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
Picasa/visited in last 30 days	4656	73.19	3.24	118
Shutterfly/visited in last 30 days	5505	78.54	3.83	127
Tumblr/visited in last 30 days	3166	62.50	2.20	101
Twitter/visited in last 30 days	12414	62.90	8.63	102
Yelp/visited in last 30 days	4524	68.42	3.15	111
YouTube/visited in last 30 days	61733	65.51	42.92	106
Activities done using social networking, photo or video-sharing site: Updated status/last 30 days	37964	64.73	26.40	105
Activities done using social networking, photo or video-sharing site: Updated profile/last 30 days	24732	64.16	17.20	104
Activities done using social networking, photo or video-sharing site: Posted a picture/last 30 days	39734	66.15	27.63	107
Activities done using social networking, photo or video-sharing site: Posted a video/last 30 days	9213	64.26	6.41	104
Activities done using social networking, photo or video-sharing site: Posted a website link/last 30 days	14020	67.18	9.75	109
Activities done using social networking, photo or video-sharing site: Visited a friend's profile or page/last 30 days	61466	67.39	42.74	109
Activities done using social networking, photo or video-sharing site: Commented on a friend's post/last 30 days	52192	67.22	36.29	109
Activities done using social networking, photo or video-sharing site: Posted a blog entry/last 30 days	5545	66.02	3.86	107
Activities done using social networking, photo or video-sharing site: Rated or reviewed a product or service/last 30 days	5545	68.68	3.86	111
Activities done using social networking, photo or video-sharing site: Sent a message or e-mail/last 30 days	52741	66.85	36.67	108
Activities done using social networking, photo or video-sharing site: Used IM/last 30 days	16871	66.20	11.73	107
Activities done using social networking, photo or video-sharing site: Played a game/last 30 days	19242	64.28	13.38	104
Activities done using social networking, photo or video-sharing site: Invited people to an event/last 30 days	7691	65.53	5.35	106
Activities done using social networking, photo or video-sharing site: Sent a real or virtual gift/last 30 days	1805	69.43	1.25	112
Activities done using social networking, photo or video-sharing site: Posted that you "like" something/last 30 days	40584	67.27	28.22	109
Activities done using social networking, photo or video-sharing site: "Followed" or became a "fan of" something or someone/last 30 days	16236	67.46	11.29	109
Activities done using social networking, photo or video-sharing site: Clicked on an advertisement/last 30 days	9220	68.42	6.41	111
Activities done using social networking, photo or video-sharing site: Watched a video/last 30 days	43050	64.85	29.93	105
Activities done using social networking, photo or video-sharing site: Posted your current location/last 30 days	9599	65.24	6.67	106

Exhibit A

Demographic Data

Now owns Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

- (h) Pub freq changed from monthly to bimonthly in W68 meas mth
 - (i) Pub monthly in W68 but meas as a bimonthly
 - (j) Pub is now monthly and meas as triwly in W65-66
 - (k) Pub is now triwly and meas as biwly in W65-68
 - (l) Pub is a net est comprised 2 sep meas but not related titles
 - (m) Pub was meas as In Touch Weekly in W65-66
 - (o) Pub is now biwly and measured as wkly in W65-66
 - (q) Pub circ and aud est only reflect daily or Sun/Wkend papers
 - (r) Pub is now biwly was meas as wkly in W65-68
 - (t) Pub was meas as WebMD The Magazine in W65-68
- * Projections relatively unstable, use with caution

Source: 2013 Doublebase GfK MRI weighted to Population (000) -

Base: All

No Audit Report Was Generated

EXHIBIT B:

**PURCHASED LAST 12 MONTHS: HOUSEHOLD
FURNISHINGS: BIG TICKET ITEMS:
SOFA/SECTIONAL, RECLINER, SOFA-BED
CONVERTIBLE, OTHER UPHOLSTERED
FURNITURE, MATTRESS, BOX SPRING, CRIB
MATTRESS, WALL-TO-WALL CARPET**

Exhibit B**Demographic Data**

Purchased last 12 Months: Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>%</u> <u>Coverage</u>	<u>Composition</u>	<u>Index</u>
All	36606	15.73	100.00	100
Men	16702	14.83	45.63	94
Women	19904	16.58	54.37	105
Parents	14456	19.59	39.49	125
Educ: graduated college plus	11658	18.06	31.85	115
Educ: attended college	10633	16.11	29.05	102
Educ: graduated high school	10422	14.71	28.47	93
Educ: did not graduate HS	3893	12.47	10.63	79
Educ: post graduate	4331	19.34	11.83	123
Educ: no college	14315	14.02	39.11	89
Age 18-24	4995	16.76	13.64	106
Age 25-34	7913	19.04	21.62	121
Age 35-44	6871	17.09	18.77	109
Age 45-54	6709	15.15	18.33	96
Age 55-64	5519	14.92	15.08	95
Age 65+	4598	11.55	12.56	73
Adults 18-34	12908	18.09	35.26	115
Adults 18-49	23178	17.33	63.32	110
Adults 25-54	21494	17.05	58.72	108
Men 18-34	5901	16.43	16.12	104
Men 18-49	10777	16.17	29.44	103
Men 25-54	9960	15.98	27.21	102
Women 18-34	7007	19.77	19.14	126
Women 18-49	12401	18.49	33.88	117
Women 25-54	11534	18.10	31.51	115
Employment: working full time	19221	17.23	52.51	109
Employment: working part time	4529	16.29	12.37	104
Employment: not working	12856	13.78	35.12	88
Occupation: professional and related occupations	5799	18.79	15.84	119
Occupation: management, business and financial operations	3907	17.56	10.67	112
Occupation: sales and office occupations	5465	16.91	14.93	107
Occupation: natural resources, construction and maintenance occup.	1958	15.37	5.35	98
Occupation: other employed	6622	16.06	18.09	102
IEI \$200,000 or over	451	20.60	1.23	131
IEI \$150,000-199,999	464	19.11	1.27	121
IEI \$100,000-149,999	1702	19.82	4.65	126
IEI \$75,000-99,999	2348	20.22	6.41	129
IEI \$60,000-74,999	2401	18.50	6.56	118
IEI \$50,000-59,999	2022	16.42	5.52	104
IEI \$40,000-49,999	2644	15.92	7.22	101
IEI \$30,000-39,999	3370	17.77	9.21	113
IEI \$20,000-29,999	3255	16.06	8.89	102
IEI <\$20,000	5093	15.23	13.91	97
Wage earner status: not employed	12856	13.78	35.12	88
Wage earner status: sole earner	6266	15.35	17.12	98

Exhibit B**Demographic Data**

Purchased last 12 Months: Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>% Composition</u>	<u>Index</u>
Wage earner status: primary earner	8163	17.36	22.30	110
Wage earner status: sec earner	9321	18.08	25.46	115
HHI \$200,000 or over	1879	17.67	5.13	112
HHI \$150,000-199,999	2778	20.08	7.59	128
HHI \$100,000-149,999	6194	17.92	16.92	114
HHI \$75,000-99,999	5766	18.68	15.75	119
HHI \$60,000-74,999	4299	17.16	11.74	109
HHI \$50,000-59,999	3165	16.69	8.65	106
HHI \$40,000-49,999	2752	13.50	7.52	86
HHI \$30,000-39,999	2859	12.74	7.81	81
HHI \$20,000-29,999	3016	13.04	8.24	83
HHI <\$20,000	3898	11.89	10.65	76
HHI \$150,000+	4657	19.04	12.72	121
HHI \$100,000+	10851	18.38	29.64	117
HHI \$75,000+	16617	18.48	45.39	117
HHI \$60,000+	20916	18.19	57.14	116
HHI \$50,000+	24081	17.98	65.78	114
HHI \$40,000+	26833	17.39	73.30	111
HHI \$30,000+	29692	16.80	81.11	107
Total Net Worth of all HH members: under \$100,000	11140	15.34	30.43	97
Total Net Worth of all HH members: \$100,000-249,999	8510	15.19	23.25	97
Total Net Worth of all HH members: \$250,000-499,999	9400	16.04	25.68	102
Total Net Worth of all HH members: \$500,000-999,999	5065	16.82	13.84	107
Total Net Worth of all HH members: \$1,000,000 or more	2491	16.25	6.81	103
Census Region: North East	7118	16.75	19.45	106
Census Region: South	13737	15.86	37.53	101
Census Region: Midwest	7824	15.45	21.37	98
Census Region: West	7927	14.99	21.66	95
Mktg Region: New England	1938	17.43	5.29	111
Mktg Region: Mid Atlantic	5966	16.56	16.30	105
Mktg Region: East Central	4591	16.11	12.54	102
Mktg Region: West Central	5392	15.61	14.73	99
Mktg Region: Southeast	7613	15.88	20.80	101
Mktg Region: Southwest	4246	15.03	11.60	96
Mktg Region: Pacific	6859	14.81	18.74	94
Mediamarkets: Top 5	6884	14.21	18.80	90
Mediamarkets: Next 5	3957	16.74	10.81	106
Mediamarkets: New York	2493	15.43	6.81	98
Mediamarkets: Los Angeles	1685	12.47	4.60	79
Mediamarkets: Chicago	1047	14.34	2.86	91
Metropolitan CBSA	30703	15.72	83.87	100
Micropolitan CBSA/unassigned	5903	15.79	16.13	100
County size A	14353	15.00	39.21	95
County size B	11728	16.48	32.04	105
County size C	5632	16.60	15.39	105

Exhibit B**Demographic Data**

Purchased last 12 Months: Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u>	<u>%</u>		
	<u>(000)</u>	<u>% Coverage</u>	<u>Composition</u>	
			<u>Index</u>	
County size D	4893	15.34	13.37	98
Marital status: never married	9076	14.30	24.79	91
Marital status: now married	22086	17.68	60.33	112
Marital status: legally separated/widowed/divorced	5444	12.30	14.87	78
Marital status: engaged	2043	17.78	5.58	113
HH size: 1	3529	10.78	9.64	69
HH size: 2	11117	15.07	30.37	96
HH size: 3-4	15048	17.44	41.11	111
HH size: 5+	6912	17.32	18.88	110
Children: any	17318	18.54	47.31	118
Children: 1	7187	18.53	19.63	118
Children: 2	6135	18.76	16.76	119
Children: 3+	3996	18.21	10.92	116
Child age: <12 months	2800	28.36	7.65	180
Child age: 12-23 months	1872	22.29	5.11	142
Child age: <2 years	4527	25.50	12.37	162
Child age: <6 years	9460	21.67	25.84	138
Child age: 2-5 years	6744	20.04	18.42	127
Child age: 6-11 years	7492	17.67	20.47	112
Child age: 12-17 years	7262	16.09	19.84	102
Life cycle: resp 18-34 1 pers HH	856	17.53	2.34	111
Life cycle: resp 18-34 married no kids	1125	20.87	3.07	133
Life cycle: resp 18-34 married yng chld <6	3611	25.52	9.86	162
Life cycle: resp 18-34 married yng chld 6-17	489	16.99	1.34	108
Life cycle: balance of resp 18-34	6827	15.49	18.65	98
Life cycle: resp 35-49 1 pers HH	567	10.82	1.55	69
Life cycle: resp 35-49 married no kids	1554	17.59	4.25	112
Life cycle:resp 35-49 married yng chld <6	2418	20.71	6.61	132
Life cycle:resp 35-49 married yng chld 6-11	2083	17.21	5.69	109
Life cycle:resp 35-49 married yng chld 12-17	1393	16.62	3.81	106
Life cycle: balance of resp 35-49	2255	14.00	6.16	89
Life cycle: resp 50+ 1 pers HH	1963	9.01	5.36	57
Life cycle: resp 50+ married no kids	7613	14.88	20.80	95
Life cycle: resp 50+ married w/kids	1800	17.50	4.92	111
Life cycle: balance of resp 50+	2052	13.08	5.61	83
Years at pres address: <1 year	8426	22.28	23.02	142
Years at pres address: 1-4 years	10012	16.42	27.35	104
Years at pres address: 5+ years	18168	13.57	49.63	86
Home owned	24590	15.57	67.18	99
Home value: \$500,000+	2171	15.62	5.93	99
Home value: \$200,000-499,999	9655	16.45	26.37	105
Home value: \$100,000-199,999	8711	16.01	23.80	102
Home value: \$50,000-99,999	2734	12.61	7.47	80
Home value: <\$50,000	1319	14.20	3.60	90
Race: White	29596	16.76	80.85	107
Race: Black/African American	3172	11.46	8.66	73
Race: American Indian or Alaska Native	440	17.00	1.20	108

Exhibit B**Demographic Data**

Purchased last 12 Months: Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>% Composition</u>	<u>Index</u>
Race: Asian	973	13.66	2.66	87
Race: Other	3115	13.78	8.51	88
Race: White only	29110	16.76	79.52	107
Race: Black/African American only	2984	11.23	8.15	71
Race: Other race/Multiple classifications	4512	13.91	12.33	88
Spanish spoken in home (most often or other)	5348	15.10	14.61	96
Hispanic Respondent personally speaks only english at home	752	15.31	2.05	97
Hispanic Respondent personally speaks mostly english, but some spanish at home	1217	15.00	3.32	95
Hispanic Respondent personally speaks only spanish at home	1031	10.88	2.82	69
Hispanic Respondent personally speaks mostly spanish, but some english at home	1598	17.55	4.36	112
Hispanic Respondent personally speaks both english and spanish equally at home	* 146	12.07	0.40	77
Hispanic Respondent personally speaks other language at home	* 96	28.66	0.26	182
Spanish, Hispanic or Latino Origin or Descent	4838	14.60	13.22	93
Pet owner	22668	16.82	61.92	107
Dog owner	17586	16.81	48.04	107
Cat owner	9402	16.56	25.68	105
Have a landline telephone	22141	14.87	60.48	94
Cell phone only (no landline) in HH	14379	17.35	39.28	110
Landline only (no cell phone) in HH	796	8.94	2.18	57
Generations: Millennials (b.1977-1994)	13657	18.16	37.31	115
Generations: GenXers (b.1965-1976)	8026	16.13	21.93	102
Generations: Boomers (b. 1946-1964)	11079	15.15	30.27	96
Generations: Early Boomers (b. 1946-1955)	4939	14.54	13.49	92
Generations: Late Boomers (b. 1956-1964)	6140	15.68	16.77	100
Generations: Pre-Boomers (b. before 1946)	3844	11.12	10.50	71
Have Internet access at home, using a computer	30486	16.58	83.28	105
Internet Service Providers (to HH): America Online (AOL)	333	16.38	0.91	104
Internet Service Providers (to HH): AT&T	4688	15.32	12.81	97
Internet Service Providers (to HH): Cablevision (Optimum)	893	15.53	2.44	99
Internet Service Providers (to HH): CenturyLink	1559	18.30	4.26	116
Internet Service Providers (to HH): Charter	1462	17.24	3.99	110
Internet Service Providers (to HH): Comcast/Xfinity	6579	17.83	17.97	113
Internet Service Providers (to HH): Cox	1367	16.26	3.74	103
Internet Service Providers (to HH): Earthlink	* 108	16.62	0.30	106
Internet Service Providers (to HH): Net Zero/Juno	* 47	11.45	0.13	73
Internet Service Providers (to HH): Road Runner (Time Warner Cable)	2995	16.45	8.18	105
Internet Service Providers (to HH): Verizon	3537	16.30	9.66	104
Internet Service Providers (to HH): Any Service	30345	16.58	82.90	105
Looked at/used Internet using a computer in the last 30 days: At home	29364	17.09	80.22	109
Looked at/used Internet using a computer in the last 30 days: At work	15826	18.26	43.23	116

Exhibit B**Demographic Data**

Purchased last 12 Months: Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>% Composition</u>	<u>Index</u>
Looked at/used Internet using a computer in the last 30 days: At school or library	3882	15.81	10.60	100
Looked at/used Internet using a computer in the last 30 days: Another place	9741	17.67	26.61	112
Looked at/used Internet using a computer in the last 30 days: Any Internet Usage	31535	16.98	86.15	108
Used Wi-Fi or wireless connection using a computer outside of home/last 30 days	10852	17.79	29.65	113
Devices used to use the Internet/last 30 days: Desktop computer	20952	16.82	57.24	107
Devices used to use the Internet/last 30 days: Laptop or Netbook computer	21647	18.12	59.13	115
Devices used to use the Internet/last 30 days: Any computer	30031	17.11	82.04	109
Devices used to use the Internet/last 30 days: iPad or other Tablet	6842	19.29	18.69	123
Devices used to use the Internet/last 30 days: Cellphone or Smartphone	19876	18.38	54.30	117
Devices used to use the Internet/last 30 days: E-reader	1741	20.19	4.76	128
Devices used to use the Internet/last 30 days: iPod or other MP3 Player	2275	17.96	6.21	114
Devices used to use the Internet/last 30 days: Video game console	2671	16.81	7.30	107
Visited a chat room/past 30 days	2062	16.83	5.63	107
Used e-mail/past 30 days	28245	17.40	77.16	111
Used instant messenger/past 30 days	18554	17.72	50.68	113
Participated in on-line dating/past 30 days	634	17.32	1.73	110
Made a purchase for personal use (on the Internet)/past 30 days	17328	18.93	47.33	120
Made a purchase for business use (on the Internet)/past 30 days	4387	17.90	11.98	114
Made personal or business travel plans online/past 30 days	7872	19.22	21.51	122
Played games online/past 30 days	10475	17.04	28.62	108
Downloaded a video game/past 30 days	3293	17.00	9.00	108
Used on-line gambling site/past 30 days	463	17.51	1.27	111
Obtained financial information online/past 30 days	12705	18.98	34.71	121
Tracked investments/Traded stocks, bonds or mutual funds online/past 30 days	4905	19.22	13.40	122
Paid bills online/past 30 days	18495	18.76	50.52	119
Obtained the latest news/current events online/past 30 days	18591	18.39	50.79	117
Obtained sports news/information online/past 30 days	11643	17.58	31.81	112
Obtained information for new/used car purchase online/past 30 days	4860	19.23	13.28	122
Obtained information about real estate online/past 30 days	5363	19.92	14.65	127
Obtained medical information online/past 30 days	8978	17.94	24.53	114
Obtained childcare or parenting information online/past 30 days	2565	22.61	7.01	144
Obtained information about entertainment or celebrities	10154	18.36	27.74	117
Looked for employment online/past 30 days	6207	17.27	16.96	110
Looked for recipes online/past 30 days	13247	18.46	36.19	117

Exhibit B**Demographic Data**

Purchased last 12 Months: Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>% Composition</u>	<u>Index</u>
Took an online class or course/past 30 days	2857	18.90	7.80	120
Visited a TV network or TV show's website/past 30 days	8022	18.02	21.91	115
Looked at TV listings online/past 30 days	3562	17.34	9.73	110
Looked up movie listings or showtimes online/past 30 days	9126	18.53	24.93	118
Listened to radio on the Internet (NET)/past 30 days	9305	18.53	25.42	118
Visited a radio station, radio program or radio personality website/past 30 days	2899	19.10	7.92	121
Downloaded music/past 30 days	8837	17.52	24.14	111
Downloaded podcasts/podcasting/past 30 days	1415	17.82	3.87	113
Downloaded a TV program/past 30 days	1762	18.99	4.81	121
Watched a TV program online/past 30 days	5540	18.40	15.13	117
Downloaded a movie/past 30 days	2762	18.89	7.55	120
Watched a movie online/past 30 days	5648	18.79	15.43	119
Watched other online video/past 30 days	5546	18.24	15.15	116
Visited online blogs/past 30 days	5156	18.88	14.09	120
Wrote online blog/past 30 days	1107	16.61	3.02	106
Posted a comment or review on a blog, online forum, message or bulletin/past 30 days	4806	19.07	13.13	121
Made a phone call online/past 30 days	6052	18.86	16.53	120
Uploaded or added video to website/past 30 days	2328	18.07	6.36	115
Shared photos through Internet website/past 30 days	11935	19.27	32.60	122
Sent an electronic greeting card/past 30 days	2007	17.59	5.48	112
Total time spent yesterday using the Internet (does not include email or IM): 10+ hours	960	15.11	2.62	96
Total time spent yesterday using the Internet (does not include email or IM): 5-10 hours	3585	17.23	9.79	110
Total time spent yesterday using the Internet (does not include email or IM): 2-5 hours	7665	17.87	20.94	114
Total time spent yesterday using the Internet (does not include email or IM): 1-2 hours	6789	17.18	18.55	109
Total time spent yesterday using the Internet (does not include email or IM): 1/2-1 hour	5212	17.32	14.24	110
Total time spent yesterday using the Internet (does not include email or IM): less than 1/2	4198	16.74	11.47	106
Total time spent last Saturday using the Internet (does not include email or IM): 10+ hours	596	15.43	1.63	98
Total time spent last Saturday using the Internet (does not include email or IM): 5-10 hours	2135	15.96	5.83	101
Total time spent last Saturday using the Internet (does not include email or IM): 2-5 hours	6686	18.67	18.26	119
Total time spent last Saturday using the Internet (does not include email or IM): 1-2 hours	6139	16.88	16.77	107
Total time spent last Saturday using the Internet (does not include email or IM): 1/2-1 hour	5061	17.21	13.82	109
Total time spent last Saturday using the Internet (does not include email or IM): less than 1/2	4350	17.98	11.88	114
Total time spent last Sunday using the Internet (does not include email or IM): 10+ hours	459	13.95	1.25	89
Total time spent last Sunday using the Internet (does not include email or IM): 5-10 hours	2095	17.43	5.72	111
Total time spent last Sunday using the Internet (does not include email or IM): 2-5 hours	5848	18.22	15.98	116

Exhibit B**Demographic Data**

Purchased last 12 Months: Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>% Composition</u>	<u>Index</u>
Total time spent last Sunday using the Internet (does not include email or IM): 1-2 hours	5938	17.04	16.22	108
Total time spent last Sunday using the Internet (does not include email or IM): 1/2-1 hour	4847	16.85	13.24	107
Total time spent last Sunday using the Internet (does not include email or IM): less than 1/2	4597	18.39	12.56	117
Website or search engines used/yesterday: AOL/AOL.com	1614	15.41	4.41	98
Website or search engines used/yesterday: Ask.com	943	18.15	2.58	115
Website or search engines used/yesterday: Bing.com	3349	18.20	9.15	116
Website or search engines used/yesterday: Excite.com	* 27	9.56	0.07	61
Website or search engines used/yesterday: Google.com	22656	17.63	61.89	112
Website or search engines used/yesterday: Yahoo.com	9456	17.06	25.83	108
Website or search engines used/last 30 days: AOL/AOL.com	2410	15.68	6.58	100
Website or search engines used/last 30 days: Ask.com	3056	18.60	8.35	118
Website or search engines used/last 30 days: Bing.com	7218	18.73	19.72	119
Website or search engines used/last 30 days: Excite.com	* 109	15.33	0.30	97
Website or search engines used/last 30 days: Google.com	28746	17.40	78.53	111
Website or search engines used/last 30 days: Yahoo.com	14493	17.12	39.59	109
Instant Messenger (IM) used/last 30 days: AIM/AOL Instant Messenger	1177	15.96	3.22	101
Instant Messenger (IM) used/last 30 days: Facebook	13568	17.44	37.07	111
Instant Messenger (IM) used/last 30 days: Google Talk/Gmail Chat	2463	19.38	6.73	123
Instant Messenger (IM) used/last 30 days: MySpace	* 312	14.30	0.85	91
Instant Messenger (IM) used/last 30 days: Skype (measured separately as Skype and Windows Live Messenger in Waves 65-68)	4944	19.62	13.51	125
Instant Messenger (IM) used/last 30 days: Yahoo! Messenger	2523	15.76	6.89	100
E-mail used/yesterday: AOL Mail	2035	15.71	5.56	100
E-mail used/yesterday: Gmail	9025	19.03	24.65	121
E-mail used/yesterday: Outlook.com (measured as Windows Live Hotmail in Waves 65-68)	3346	18.43	9.14	117
E-mail used/yesterday: Yahoo! Mail	8666	17.29	23.67	110
E-mail used/last 30 days: AOL Mail	2731	15.63	7.46	99
E-mail used/last 30 days: Gmail	11183	18.91	30.55	120
E-mail used/last 30 days: Outlook.com (measured as Windows Live Hotmail in Waves 65-68)	4573	19.04	12.49	121
E-mail used/last 30 days: Yahoo! Mail	11301	17.06	30.87	108
ABC.com/visited in last 30 days	1958	19.22	5.35	122
CBS.com/visited in last 30 days	1467	18.60	4.01	118
Disney.com/visited in last 30 days	1011	18.20	2.76	116
FarmVille/visited in last 30 days	435	14.73	1.19	94

Exhibit B**Demographic Data**

Purchased last 12 Months: Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u>	<u>%</u>		
	<u>(000)</u>	<u>% Coverage</u>	<u>Composition</u>	<u>Index</u>
Fox.com/visited in last 30 days	1902	19.92	5.20	127
Hulu.com/visited in last 30 days	2538	18.78	6.93	119
IMDb.com/visited in last 30 days	2676	20.08	7.31	128
iTunes.com/visited in last 30 days	5801	18.66	15.85	119
iVillage.com/visited in last 30 days	* 109	20.72	0.30	132
Moviefone.com/visited in last 30 days	473	14.78	1.29	94
MSN Movies/visited in last 30 days	221	14.32	0.60	91
MTV.com/visited in last 30 days	651	16.33	1.78	104
NBC.com/visited in last 30 days	1592	20.54	4.35	131
Pandora.com/visited in last 30 days	6188	18.55	16.90	118
PBS.org/visited in last 30 days	978	16.96	2.67	108
Ticketmaster.com/visited in last 30 days	2037	18.84	5.57	120
Yahoo! Movies/visited in last 30 days	951	16.24	2.60	103
About.com/visited in last 30 days	1248	18.29	3.41	116
Answers.com/WikiAnswers/visited in last 30 days	2320	18.56	6.34	118
Bankrate.com/visited in last 30 days	489	20.99	1.34	133
eHow.com/visited in last 30 days	2405	19.09	6.57	121
Superpages.com/visited in last 30 days	181	16.03	0.50	102
WebMD.com/visited in last 30 days	5751	20.20	15.71	128
WhitePages.com/visited in last 30 days	2203	18.70	6.02	119
Wikipedia.org/visited in last 30 days	8392	18.98	22.92	121
Yahoo! Answers/visited in last 30 days	2841	19.38	7.76	123
Yellowpages.com (YP.com)/visited in last 30	3259	20.54	8.90	131
CareerBuilder.com/visited in last 30 days	2341	17.67	6.39	112
Monster.com/visited in last 30 days	1767	16.71	4.83	106
ABCNews.com/visited in last 30 days	1632	17.39	4.46	111
CBSNews.com/visited in last 30 days	1209	20.29	3.30	129
CNN.com/visited in last 30 days	4441	18.90	12.13	120
FOXNews.com/visited in last 30 days	3504	18.20	9.57	116
Huffington Post.com/visited in last 30 days	2436	19.33	6.65	123
NBCNews.com (measured as MSNBC.com in waves 65-67)/visited in last 30 days	2618	18.15	7.15	115
NYTimes.com/visited in last 30 days	2916	17.64	7.96	112
USAToday.com/visited in last 30 days	2124	17.49	5.80	111
WSJ.com/visited in last 30 days	1892	18.56	5.17	118
Yahoo! News/visited in last 30 days	5424	17.02	14.82	108
Amazon.com/visited in last 30 days	11470	18.99	31.33	121
Coupons.com/visited in last 30 days	1470	18.84	4.02	120
eBay.com/visited in last 30 days	7600	18.87	20.76	120
Groupon.com/visited in last 30 days	3326	19.29	9.09	123
Overstock.com/visited in last 30 days	2883	22.03	7.88	140
ShopAtHome.com/visited in last 30 days	* 161	12.16	0.44	77
Univision.com/visited in last 30 days	674	17.39	1.84	110
Yahoo! en Espanol/visited in last 30 days	* 308	17.61	0.84	112
any spanish language website/visited in last 30 days	1015	17.42	2.77	111
AOL.SportingNews.com/visited in last 30 days	278	17.20	0.76	109
CBSSports.com/visited in last 30 days	966	18.18	2.64	116
ESPN.com/visited in last 30 days	5412	17.08	14.78	109

Exhibit B**Demographic Data**

Purchased last 12 Months: Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>% Composition</u>	<u>Index</u>
FOXSports.com/visited in last 30 days	1562	16.40	4.27	104
MLB.com/visited in last 30 days	1488	19.10	4.07	121
NASCAR.com/visited in last 30 days	1055	19.19	2.88	122
NBA.com/visited in last 30 days	1143	15.06	3.12	96
NBC Sports website/visited in last 30 days	827	18.08	2.26	115
NFL.com/visited in last 30 days	2578	16.90	7.04	107
WWE.com/visited last 30 days	509	17.75	1.39	113
Yahoo! Sports/visited in last 30 days	2337	15.99	6.39	102
CNET.com/visited in last 30 days	1306	19.17	3.57	122
Bings Maps/visited in last 30 days	1051	17.31	2.87	110
CheapTickets.com/visited in last 30 days	1889	19.01	5.16	121
Expedia.com/visited in last 30 days	3568	20.46	9.75	130
Hotels.com/visited in last 30 days	2076	20.51	5.67	130
Hotwire.com/visited in last 30 days	1576	19.67	4.30	125
MapQuest.com/visited in last 30 days	6860	17.48	18.74	111
Maps.google.com (Google Maps)/visited in last 30 days	8526	18.67	23.29	119
Orbitz.com/visited in last 30 days	2262	21.04	6.18	134
Priceline.com/visited in last 30 days	2085	19.20	5.69	122
Travelocity.com/visited in last 30 days	2758	20.17	7.53	128
TripAdvisor.com/visited in last 30 days	1576	21.86	4.31	139
Yahoo! Maps/visited in last 30 days	2996	17.01	8.18	108
AccuWeather.com/visited in last 30 days	3015	18.07	8.23	115
Weather.com/visited in last 30 days	11093	18.22	30.30	116
WeatherBug.com/visited in last 30 days	1815	17.69	4.96	112
Facebook/visited in last 30 days	20980	17.54	57.31	111
Flickr/visited in last 30 days	928	19.25	2.54	122
Foursquare/visited in last 30 days	424	22.90	1.16	146
LinkedIn/visited in last 30 days	3532	19.36	9.65	123
MySpace/visited in last 30 days	828	17.44	2.26	111
Photobucket/visited in last 30 days	1023	18.84	2.79	120
Picasa/visited in last 30 days	1315	20.67	3.59	131
Shutterfly/visited in last 30 days	1351	19.28	3.69	123
Tumblr/visited in last 30 days	828	16.34	2.26	104
Twitter/visited in last 30 days	3417	17.31	9.33	110
Yelp/visited in last 30 days	1223	18.50	3.34	118
YouTube/visited in last 30 days	16765	17.79	45.80	113
Activities done using social networking, photo or video-sharing site: Updated status/last 30 days	10727	18.29	29.30	116
Activities done using social networking, photo or video-sharing site: Updated profile/last 30 days	6896	17.89	18.84	114
Activities done using social networking, photo or video-sharing site: Posted a picture/last 30 days	11130	18.53	30.41	118
Activities done using social networking, photo or video-sharing site: Posted a video/last 30 days	2620	18.28	7.16	116
Activities done using social networking, photo or video-sharing site: Posted a website link/last 30 days	3725	17.85	10.18	113
Activities done using social networking, photo or video-sharing site: Visited a friend's profile or page/last 30 days	16626	18.23	45.42	116

Exhibit B**Demographic Data**

Purchased last 12 Months: Household Furnishings: Big Ticket Items: Sofa/sectional, Recliner, Sofa-bed convertible, other upholstered furniture, mattress, box spring, crib mattress, wall-to-wall carpet

	<u>Persons</u> <u>(000)</u>	<u>% Coverage</u>	<u>% Composition</u>	<u>Index</u>
Activities done using social networking, photo or video-sharing site: Commented on a friend's post/last 30 days	14164	18.24	38.69	116
Activities done using social networking, photo or video-sharing site: Posted a blog entry/last 30 days	1567	18.65	4.28	119
Activities done using social networking, photo or video-sharing site: Rated or reviewed a product or service/last 30 days	1624	20.12	4.44	128
Activities done using social networking, photo or video-sharing site: Sent a message or e-mail/last 30 days	14388	18.24	39.31	116
Activities done using social networking, photo or video-sharing site: Used IM/last 30 days	4783	18.77	13.07	119
Activities done using social networking, photo or video-sharing site: Played a game/last 30 days	5287	17.66	14.44	112
Activities done using social networking, photo or video-sharing site: Invited people to an event/last 30 days	2000	17.04	5.46	108
Activities done using social networking, photo or video-sharing site: Sent a real or virtual gift/last 30 days	510	19.62	1.39	125
Activities done using social networking, photo or video-sharing site: Posted that you "like" something/last 30 days	11352	18.82	31.01	120
Activities done using social networking, photo or video-sharing site: "Followed" or became a "fan of" something or someone/last 30 days	4340	18.03	11.85	115
Activities done using social networking, photo or video-sharing site: Clicked on an advertisement/last 30 days	2629	19.51	7.18	124
Activities done using social networking, photo or video-sharing site: Watched a video/last 30 days	11792	17.76	32.21	113
Activities done using social networking, photo or video-sharing site: Posted your current location/last 30 days	2831	19.25	7.73	122

(h) Pub freq changed from monthly to bimonthly in W68 meas mth

(i) Pub monthly in W68 but meas as a bimonthly

(j) Pub is now monthly and meas as triwly in W65-66

(k) Pub is now triwly and meas as biwly in W65-68

(l) Pub is a net est comprised 2 sep meas but not related titles

(m) Pub was meas as In Touch Weekly in W65-66

(o) Pub is now biwly and measured as wkly in W65-66

(q) Pub circ and aud est only reflect daily or Sun/Wkend papers

(r) Pub is now biwly was meas as wkly in W65-68

(t) Pub was meas as WebMD The Magazine in W65-68

* Projections relatively unstable, use with caution

Source: 2013 Doublebase GfK MRI weighted to Population (000) -

Base: All

No Audit Report Was Generated

EXHIBIT C:
MEDIA QUINTILE ANALYSIS

Exhibit C**Media Quintile Analysis****Demo: Adults Age 25-69**

	<u>Weighted</u> <u>(000)</u>	<u>% Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
Adults 25-69	175417	75.40	100.00	100
Magazine Quintile I	36208	77.93	20.64	103
Magazine Quintile II	35091	75.58	20.00	100
Magazine Quintile III	35021	75.22	19.96	100
Magazine Quintile IV	35045	75.21	19.98	100
Magazine Quintile V	34052	73.06	19.41	97
Newspaper Quintile I	32159	69.30	18.33	92
Newspaper Quintile II	36299	77.86	20.69	103
Newspaper Quintile III	35858	77.15	20.44	102
Newspaper Quintile IV	35404	76.18	20.18	101
Newspaper Quintile V	35697	76.46	20.35	101
Radio Quintile I	36656	78.68	20.90	104
Radio Quintile II	36733	79.02	20.94	105
Radio Quintile III	37275	80.15	21.25	106
Radio Quintile IV	35108	75.31	20.01	100
Radio Quintile V	29645	63.81	16.90	85
TV (Total) Quintile I	32448	69.94	18.50	93
TV (Total) Quintile II	34788	74.80	19.83	99
TV (Total) Quintile III	36627	78.74	20.88	104
TV (Total) Quintile IV	36468	78.21	20.79	104
TV (Total) Quintile V	35087	75.28	20.00	100
Internet Quintile I (Heavy)	35299	75.74	20.12	100
Internet Quintile II	37141	80.07	21.17	106
Internet Quintile III	37777	80.99	21.54	107
Internet Quintile IV	35334	76.10	20.14	101
Internet Quintile V (Light)	29866	64.11	17.03	85
Outdoor Quintile I	38283	82.45	21.82	109
Outdoor Quintile II	38278	82.49	21.82	109
Outdoor Quintile III	35558	76.51	20.27	101
Outdoor Quintile IV	32579	70.08	18.57	93
Outdoor Quintile V	30719	65.55	17.51	87
TV (Primetime) Quintile I	35114	75.78	20.02	101
TV (Primetime) Quintile II	35856	77.31	20.44	103
TV (Primetime) Quintile III	36230	77.74	20.65	103
TV (Primetime) Quintile IV	34943	74.79	19.92	99
TV (Primetime) Quintile V	33273	71.39	18.97	95
TV (Daytime) Tercile I	15912	65.99	9.07	88
TV (Daytime) Tercile II	16470	68.22	9.39	90
TV (Daytime) Tercile III	16185	66.82	9.23	89

* Projections relatively unstable, use with caution

Source: 2013 Doublebase GfK MRI weighted to Population (000) -

Base: All

No Audit Report Was Generated

EXHIBIT D:
MAGAZINE RANKER

Exhibit D**Magazine Ranker****Demographic: Adults age 25-69**

	<u>Audience</u> <u>(000)</u>	<u>%</u> <u>Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
Adults 25-69	175417	75.40	100.00	100
NNN Top 100-Sunday [newspaper]	56043	74.78	31.95	99
Parade Carrier Newspapers [q] [newspaper]	43922	74.79	25.04	99
NNN Top 100-Daily [newspaper]	38121	71.43	21.73	95
Metro-Puck Carrier Newspaper [newspaper]	36205	76.78	20.64	102
NNN Top 25-Sunday [newspaper]	33024	75.47	18.83	100
People	32441	76.59	18.49	102
Better Homes & Gardens	28927	80.26	16.49	106
USA Weekend Carrier Newspapers [q]	27492	74.09	15.67	98
National Geographic	23297	74.59	13.28	99
AARP The Magazine	22915	69.53	13.06	92
NNN Top 25-Daily [newspaper]	22645	71.80	12.91	95
Reader's Digest	17558	74.34	10.01	99
Costco Connection, The	17199	85.05	9.80	113
Good Housekeeping	16759	80.02	9.55	106
NNN Top 10-Daily [newspaper]	14476	73.49	8.25	97
Woman's Day [j]	14458	79.80	8.24	106
Sports Illustrated	14442	74.17	8.23	98
Family Circle [j]	13554	78.01	7.73	103
Time	13516	75.03	7.71	100
Parents	11859	85.06	6.76	113
Southern Living	11780	78.81	6.72	105
Cosmopolitan	11768	69.28	6.71	92
Consumer Reports	11316	76.35	6.45	101
ESPN The Magazine	10414	71.81	5.94	95
O, Oprah Magazine, The	10172	84.76	5.80	112
Men's Health	10031	80.64	5.72	107
Sunday Mag/Net Carrier Newspapers	9999	76.76	5.70	102
Us Weekly	9513	76.08	5.42	101
Cooking Light	9432	86.41	5.38	115
Country Living	8972	80.32	5.11	107
Rolling Stone	8703	72.74	4.96	96
Martha Stewart Living	8560	84.66	4.88	112
Glamour	8505	74.09	4.85	98
Car And Driver	8381	80.70	4.78	107
Women's Health	8323	81.96	4.74	109
TV Guide [r]	8141	70.72	4.64	94
Vogue	8123	70.49	4.63	93
Weight Watchers	8086	81.13	4.61	108
In Style	7943	78.46	4.53	104
Food Network Magazine	7866	77.84	4.48	103
Ladies' Home Journal	7803	77.11	4.45	102
Entertainment Weekly	7704	78.41	4.39	104
Ebony	7178	81.06	4.09	108
Maxim	7092	78.98	4.04	105
Field & Stream	6928	80.24	3.95	106

Exhibit D**Magazine Ranker****Demographic: Adults age 25-69**

	<u>Audience</u> <u>(000)</u>	<u>%</u> <u>Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
Prevention	6822	79.03	3.89	105
Real Simple	6603	88.22	3.76	117
Redbook	6534	83.89	3.72	111
National Geographic Traveler	6507	77.08	3.71	102
Star	6477	77.99	3.69	103
Guns & Ammo	6446	76.90	3.67	102
WebMD the Magazine [t]	6383	83.30	3.64	110
Popular Mechanics	6376	78.00	3.63	103
Food & Wine	6320	87.01	3.60	115
Men's Fitness	6166	78.49	3.52	104
National Enquirer	6140	82.22	3.50	109
Essence	6059	83.80	3.45	111
Fitness	6047	81.61	3.45	108
Health	6025	79.52	3.43	105
Scholastic Parent & Child	5834	83.60	3.33	111
Game Informer	5826	59.15	3.32	78
Woman's World	5776	84.73	3.29	112
Diabetic Cooking	5725	81.72	3.26	108
National Geographic Kids	5715	90.11	3.26	120
Jet [o]	5582	82.58	3.18	110
Money	5556	81.21	3.17	108
People En Espanol	5543	79.51	3.16	105
Motor Trend	5521	77.92	3.15	103
Every Day with Rachael Ray	5400	86.88	3.08	115
In Touch [m]	5193	75.80	2.96	101
Tribune Newspapers Sunday	5168	76.11	2.95	101
Popular Science	5078	74.98	2.89	99
Bon Appetit	5011	83.92	2.86	111
Vanity Fair	5017	77.23	2.86	102
GQ (Gentlemen's Quarterly)	4984	77.12	2.84	102
Cooking with Paula Deen	4934	80.86	2.81	107
Shape	4904	85.43	2.80	113
Discover	4866	74.49	2.77	99
Hot Rod	4853	78.23	2.77	104
Allure	4755	74.61	2.71	99
Golf Digest	4685	80.00	2.67	106
Travel + Leisure	4688	86.61	2.67	115
Self	4664	85.11	2.66	113
This Old House	4674	87.26	2.66	116
Smithsonian	4651	72.42	2.65	96
House Beautiful	4581	82.50	2.61	109
Outdoor Life	4455	80.28	2.54	106
Delta Sky Magazine	4387	87.73	2.50	116
Muscle & Fitness	4318	74.95	2.46	99
North American Hunter	4291	80.99	2.45	107
Birds & Blooms	4286	70.99	2.44	94
Playboy	4163	73.35	2.37	97
Seventeen	4159	50.74	2.37	67

Exhibit D**Magazine Ranker****Demographic: Adults age 25-69**

	<u>Audience</u> <u>(000)</u>	<u>%</u> <u>Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
Elle	4132	73.20	2.36	97
Family Handyman, The	4049	86.87	2.31	115
FamilyFun	4035	84.86	2.30	113
Garden Design [q]	4020	84.32	2.29	112
American Rifleman	3978	76.53	2.27	102
Diabetes Self-Management	3980	76.16	2.27	101
Golf Magazine	3980	80.40	2.27	107
Road & Track	3969	82.67	2.26	110
Brides [h]	3927	75.65	2.24	100
Traditional Home	3909	83.33	2.23	111
Sunset	3869	80.74	2.21	107
Forbes [k]	3864	77.42	2.20	103
American Baby	3807	74.53	2.17	99
National Wildlife	3759	72.15	2.14	96
Guideposts	3708	69.72	2.11	92
American Hunter	3690	81.73	2.10	108
Game & Fish / Sportsman [l]	3683	77.31	2.10	103
Eating Well	3650	81.64	2.08	108
Architectural Digest	3636	83.74	2.07	111
Coastal Living	3489	88.84	1.99	118
First for Women	3450	87.66	1.97	116
All You	3398	86.88	1.94	115
OK!	3357	68.56	1.91	91
Diabetes Forecast	3313	79.94	1.89	106
Bridal Guide	3152	76.97	1.80	102
Life & Style Weekly	3104	73.71	1.77	98
Marie Claire	3105	79.50	1.77	105
Arthritis Today	3063	73.50	1.75	97
Fortune	3069	83.90	1.75	111
Soap Opera Digest	3011	83.53	1.72	111
Southwest Spirit	2990	85.93	1.70	114
New York Times (Sunday) [newspaper]	2945	76.90	1.68	102
Automobile	2825	78.79	1.61	105
Tribune Newspapers Daily	2833	68.28	1.61	91
Conde Nast Traveler	2814	84.70	1.60	112
In-Fisherman	2757	85.65	1.57	114
New Yorker, The	2762	77.00	1.57	102
Midwest Living	2735	77.38	1.56	103
Town & Country	2734	80.70	1.56	107
Black Enterprise	2719	86.19	1.55	114
Natural Health	2694	83.20	1.54	110
Harper's Bazaar	2688	83.00	1.53	110
Bassmaster	2665	83.21	1.52	110
US Airways Magazine	2661	86.90	1.52	115
Wine Spectator	2632	90.07	1.50	119
North American Fisherman	2579	78.93	1.47	105
Psychology Today	2571	76.77	1.47	102
United Hemispheres [o]	2419	91.35	1.38	121

Exhibit D**Magazine Ranker****Demographic: Adults age 25-69**

	<u>Audience</u> <u>(000)</u>	<u>%</u> <u>Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
PC World	2379	80.01	1.36	106
USA Today [q] [newspaper]	2381	80.53	1.36	107
Scientific American	2372	81.35	1.35	108
Entrepreneur	2327	88.66	1.33	118
Hunting	2297	81.96	1.31	109
Esquire	2236	86.16	1.27	114
Runner's World	2221	83.54	1.27	111
WWE Magazine	2219	68.97	1.27	91
Wired	2219	80.13	1.26	106
Super Chevy	2201	76.51	1.25	101
Texas Monthly	2162	86.82	1.23	115
Wall Street Journal [q] [newspaper]	2156	76.86	1.23	102
4 Wheel & Off-Road	2079	79.87	1.19	106
Economist, The	2077	79.05	1.18	105
Cycle World	2051	80.67	1.17	107
Lucky	2055	78.68	1.17	104
Car Craft	1987	82.77	1.13	110
Four Wheeler	1961	79.79	1.12	106
Mother Earth News	1956	83.92	1.12	111
Latina	1939	80.05	1.11	106
American Legion	1915	59.84	1.09	79
Country Sampler	1908	87.39	1.09	116
Outside	1883	83.27	1.07	110
Ser Padres	1875	91.79	1.07	122
Elle Decor	1837	86.53	1.05	115
VFW Magazine	1834	65.75	1.05	87
Motorcyclist	1827	85.57	1.04	113
Working Mother	1818	90.79	1.04	120
Ducks Unlimited	1781	67.81	1.02	90
New York Times Daily [newspaper]	1788	79.57	1.02	106
Street Rodder	1781	78.92	1.02	105
Boating	1758	83.95	1.00	111
Yoga Journal	1698	85.50	0.97	113
Los Angeles Times (Sunday) [newspaper]	1648	76.92	0.94	102
Handy	1633	83.65	0.93	111
Saturday Evening Post	1567	69.35	0.89	92
Catholic Digest [i]	1551	72.21	0.88	96
Chicago Tribune Sunday [newspaper]	1502	77.52	0.86	103
Kiplinger's Personal Finance	1502	77.96	0.86	103
Siempre Mujer	1503	87.42	0.86	116
Bicycling	1494	88.88	0.85	118
Cigar Aficionado	1498	85.23	0.85	113
Teen Vogue	1494	43.11	0.85	57
More	1455	88.77	0.83	118
Popular Photography	1444	76.12	0.82	101
American Way	1357	90.81	0.77	120
New York Magazine	1316	79.84	0.75	106
Fit Pregnancy	1306	75.58	0.74	100

Exhibit D**Magazine Ranker****Demographic: Adults age 25-69**

	<u>Audience</u> <u>(000)</u>	<u>%</u> <u>Coverage</u>	<u>%</u> <u>Composition</u>	<u>Index</u>
Yankee	1301	72.27	0.74	96
Salt Water Sportman	1273	85.63	0.73	114
Veranda	1274	84.30	0.73	112
Washington Post (Sunday) [newspaper]	1243	76.72	0.71	102
Macworld	1188	79.86	0.68	106
Inc.	1171	88.49	0.67	117
Tennis	1173	83.52	0.67	111
Audubon	1111	72.77	0.63	97
Backpacker	1012	89.41	0.58	119
USA Hockey	1026	79.12	0.58	105
W	1024	72.74	0.58	96
Atlantic, The	959	81.30	0.55	108
Ski	962	75.94	0.55	101
Dwell	931	88.50	0.53	117
Sierra	903	80.44	0.51	107
Details	878	91.27	0.50	121
Dirt Rider	880	63.53	0.50	84
American Photo	846	78.68	0.48	104
Golf World	838	76.22	0.48	101
Maximum PC	836	77.50	0.48	103
Flying	760	77.92	0.43	103
Yachting	712	88.35	0.41	117
Barron's	585	71.18	0.33	94

(h) Pub freq changed from monthly to bimthly in W68 meas mth

(i) Pub monthly in W68 but meas as a bimonthly

(j) Pub is now monthly and meas as triwly in W65-66

(k) Pub is now triwly and meas as biwly in W65-68

(l) Pub is a net est comprised 2 sep meas but not related titles

(m) Pub was meas as In Touch Weekly in W65-66

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(q) Pub circ and aud est only reflect daily or Sun/Wkend papers

(r) Pub is now biwly was meas as wkly in W65-68

(t) Pub was meas as WebMD The Magazine in W65-68

* Projections relatively unstable, use with caution

Source: 2013 Doublebase GfK MRI weighted to Population (000) -

Base: All

No Audit Report Was Generated

EXHIBIT E:
PARADE NEWSPAPER LISTING

Exhibit E

Parade Newspaper Listing

Newspaper by State

<u>STATE</u>	<u>HOME CITY</u>	<u>NEWSPAPER NAME</u>
Alabama	Alexander City	The Outlook
	Anniston	The Anniston Star
	Athens	The Athens News Courier
	Birmingham	The Birmingham News
	Cullman	The Cullman Times
	Gadsden	The Gadsden Times
	Huntsville	The Huntsville Times
	Mobile/Pensacola	Press/Register
	Selma	The Selma Times-Journal
	Talladega	The Daily Home
	Tuscaloosa	The Tuscaloosa News
Alaska	Anchorage	Anchorage Daily News
	Fairbanks	Fairbanks Daily News-Miner
	Juneau	Juneau Empire
	Kenai	Peninsula Clarion
Arizona	Cottonwood	Verde Independent & The Bugle
	Flagstaff	Arizona Daily Sun
	Kingman	The Kingman Daily Miner
	Lake Havasu City	Today's News-Herald
	Mesa	East Valley Tribune
	Prescott	The Daily Courier
	Sun City	News-Sun
	Tucson	The Arizona Daily Star
	Yuma	The Sun
Arkansas	Blytheville	Blytheville Courier News
	Conway	Log Cabin Democrat
	El Dorado	Sunday News
	Fayetteville	Northwest Arkansas Democrat Gazette
	Little Rock	Arkansas Democrat-Gazette
California	Bakersfield	The Bakersfield Californian

Exhibit E

Parade Newspaper Listing

Newspaper by State

STATE**HOME CITY****NEWSPAPER NAME**

Camarillo	Ventura County Star
El Centro	Imperial Valley Press
Escondido	North County Times
Fairfield	Daily Republic
Fresno	The Fresno Bee
Fresno/Select	Yes! Your Essential Shopper
Hanford	The Sentinel
Lompoc	Lompoc Record
Los Angeles	Los Angeles Times
Marysville/Yuba City	A-D Light
Marysville/Yuba City	Appeal-Democrat
Merced	Merced Sun-Star
Modesto	The Modesto Bee
Modesto/Select	Yes! Your Essential Shopper
Napa	Register
Palmdale	Antelope Valley Press
Porterville	Recorder
Redding	Record Searchlight
Riverside	The Press Enterprise
Sacramento	The Sacramento Bee
Sacramento/Select	Yes! Your Essential Shopper
San Diego	The San Diego Union-Tribune
San Diego/TMC	Local Community Values
San Francisco	San Francisco Chronicle
San Luis Obispo	The Tribune
Santa Ana	The Orange County Register
Santa Ana/TMC	Sunday Preferred
Santa Barbara	Santa Barbara News-Press
Santa Barbara/TMC	Santa Barbara News-Press Direct
Santa Maria	Santa Maria Times
Santa Maria Select	Central Coast Preview
Santa Rosa	The Press Democrat
Stockton	The Record
Victorville	Daily Press

Colorado

Boulder	Sunday Camera
Canon City	Canon City Daily Record
Colorado Springs	The Gazette

Exhibit E

Parade Newspaper Listing

Newspaper by State

STATE**HOME CITY****NEWSPAPER NAME**

Colorado Springs/Select
 Denver
 Denver/Select
 Grand Junction
 Longmont
 Loveland
 Montrose
 Pueblo
 Trinidad

Sunday Preferred
 The Denver Post
 Sunday Select
 The Daily Sentinel
 Times-Call
 Reporter-Herald
 Montrose Daily Press
 The Pueblo Chieftain
 The Chronicle-News

Connecticut

Bridgeport
 Danbury
 Greenwich
 Manchester
 Meriden
 Middletown
 New Britain
 New Haven
 New London
 Stamford
 Torrington
 Waterbury

Connecticut Post
 The News-Times
 Time
 Journal Inquirer
 Record-Journal
 The Middletown Press
 Herald Press
 New Haven Register
 The Day
 The Advocate
 The Register Citizen
 The Sunday Republican

Delaware

Dover

State News Sunday

District of Columbia

Washington

The Washington Post

Florida

Bradenton
 Bradenton/Select
 Cape Coral
 Ft. Walton Beach
 Gainesville
 Gainesville/Select
 Jacksonville
 Lake City

Bradenton Herald
 Yes! Your Essential Shopper
 Cape Coral Daily Breeze
 Northwest Florida Daily News
 The Gainesville Sun
 Shop Gainesville
 The Florida Times-Union
 Lake City Reporter

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Parade Newspaper Listing

Newspaper by State

<u>STATE</u>	<u>HOME CITY</u>	<u>NEWSPAPER NAME</u>
	Lakeland	The Ledger
	Live Oak	Live Oak Suwannee Democrat
	Miami	El Nuevo Herald
	Miami	The Miami Herald
	Miami/Select	The Miami Herald Sunday Select
	Naples/Bonita	Daily News
	Ocala	Star-Banner
	Ocala/Select	Shop Ocala
	Orlando	El Sentinel
	Orlando	Orlando Sentinel
	Orlando/Select	Go Shopping, Orlando
	Orlando/TMC	What's the Deal, Orlando?
	Panama City	Freedom Florida Newspapers
	Panama City	The News Herald
	Sarasota	Herald-Tribune
	St. Augustine	St. Augustine Record
	St. Petersburg	Tampa Bay Times
	Stuart	SCRIPPS Treasure Coast Newspapers
	Tampa	The Tampa Tribune
	The Villages	Daily Sun
	West Palm Beach	Real Values
	West Palm Beach	The Palm Beach Post
	Winter Haven	The Reporter
Georgia		
	Americus	Americus Times-Recorder
	Athens	Athens Banner-Herald
	Atlanta	The Atlanta Journal-Constitution
	Atlanta/Select	Buyer's Edge Select
	Atlanta/TMC	Atlanta - Reach
	Augusta	The Augusta Chronicle
	Augusta Select	Yes! Your Essential Shopper
	Columbus	Columbus Ledger-Enquirer
	Columbus/Select	Yes! Your Essential Shopper
	Cordele	Cordele Dispatch
	Hinesville	Liberty County Coastal Courier
	Macon	The Telegraph
	Macon/Select	Yes! Your Essential Shopper
	Milledgeville	The Milledgeville Union-Recorder

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Parade Newspaper Listing

Newspaper by State

<u>STATE</u>	<u>HOME CITY</u>	<u>NEWSPAPER NAME</u>
	Moultrie	The Moultrie Observer
	Richmond Hill	Bryan County News
	Rome	Rome News-Tribune
	Savannah	Savannah Morning News
	Statesboro	Statesboro Herald
	Thomasville	Thomasville Times-Enterprise
	Tifton	The Tifton Gazette
	Valdosta	The Valdosta Daily Times
Hawaii		
	Wailuku	The Maui News
Idaho		
	Boise	Idaho Statesman
	Boise/Select	Yes! Your Essential Shopper
	Idaho Falls	Post Register
	Lewiston	Lewiston Morning Tribune
	Nampa	Idaho Press Tribune
	Pocatello	Idaho State Journal
	Rexburg	Standard Journal
	Twin Falls	The Times-News
Illinois		
	Alton	The Telegraph
	Belleville	Belleville Community Newspapers
	Belleville	Belleville News-Democrat
	Belleville/Select	Yes! Your Essential Shopper
	Bloomington	The Pantagraph
	Canton	The Daily Ledger
	Carbondale	The Southern Illinoisan
	Champaign/Urbana	The News-Gazette
	Chicago	Chicago Tribune
	Chicago/Fin de Semana	Hoy fin de semana
	Chicago/Select	Chicago Tribune Sunday Select
	Decatur	Herald & Review
	Effingham	Effingham Daily News
	Freeport	The Journal Standard
	Galesburg	The Register-Mail
	Jacksonville	Jacksonville Journal-Courier

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Parade Newspaper Listing

Newspaper by State

STATE**HOME CITY****NEWSPAPER NAME**

Kewanee	Star Courier
Macomb	The Macomb Journal
Monmouth	Daily Review Atlas
Mount Vernon	Mt. Vernon Register-News
Ottawa	The Times
Pekin	Pekin Daily Times
Peoria	Journal Star
Quincy	Quincy Herald-Whig
Springfield	The State Journal-Register

Indiana

Anderson	The Herald Bulletin
Batesville	The Batesville Herald Tribune
Bloomington	Hoosier Times
Columbus	The Republic
Evansville	Evansville Courier & Press
Franklin	Daily Journal
Ft. Wayne	The Journal Gazette
Goshen	The Goshen News
Greenfield	Daily Reporter
Greensburg	Greensburg News
Kokomo	Kokomo Tribune
Lebanon	The Lebanon Reporter
Logansport	Pharos-Tribune
Mooreville/Decatur	Reporter-Times
Munster	The Times
New Albany/Jeffersonville	The Evening News & The Tribune
Rushville	Rushville Republican
Seymour	The Tribune
South Bend	South Bend Tribune
Terre Haute	Tribune-Star

Iowa

Ames	The Tribune
Cedar Rapids	The Gazette
Clinton	Clinton Herald
Davenport	Quad-City Times
Dubuque	Telegraph-Herald
Fort Dodge	The Messenger

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Parade Newspaper Listing

Newspaper by State

<u>STATE</u>	<u>HOME CITY</u>	<u>NEWSPAPER NAME</u>
	Knoxville	The Knoxville Crossville Chronicle
	Marshalltown	Times-Republican
	Mason City	Globe-Gazette
	Muscatine	Muscatine Journal
	Oskaloosa	Oskaloosa Herald
	Ottumwa	The Ottumwa Courier
	Sioux City	Sioux City Journal
	Waterloo	The Courier
Kansas		
	Garden City	The Garden City Telegram
	Great Bend	Great Bend Tribune
	Hays	The Hays Daily News
	Hutchinson	Hutchinson News
	Manhattan	The Manhattan Mercury
	Ottawa	The Ottawa Herald
	Salina	Salina Journal
	Topeka	Topeka Capital-Journal
	Wichita	The Wichita Eagle
	Wichita/Select	Yes! Your Essential Shopper
Kentucky		
	Ashland	The Independent
	Bowling Green	Daily News
	Corbin	Corbin Times-Tribune
	Danville	The Kentucky Advocate
	Elizabethtown	The News Enterprise
	Glasgow	The Glasgow Daily Times
	Henderson	The Gleaner
	Lexington	Lexington Herald-Leader
	Lexington/Select	Yes! Your Essential Shopper
	London	The London Sentinel-Echo
	Maysville	The Ledger Independent
	Somerset	Commonwealth Journal
Louisiana		
	Abbeville-Eunice-Ville Platte	Meridional-News-Gazette
	Baton Rouge	The Advocate
	Crowley	The Crowley Post-Signal

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Parade Newspaper Listing

Newspaper by State

STATE**HOME CITY****NEWSPAPER NAME**

Franklin
 Houma
 Lake Charles
 Morgan City
 New Orleans
 Ruston

The Banner Tribune
 The Courier
 American Press
 The Daily Review
 The Times-Picayune
 The Ruston Daily Leader

Maine

Augusta
 Lewiston
 Portland
 Waterville

Kennebeck Journal
 Sun Journal
 Maine Sunday Telegram
 Morning Sentinel

Maryland

Baltimore
 Baltimore/Select
 Baltimore/Weeklies
 Cumberland
 Easton
 Elkton
 Hagerstown

The Sun
 Deals @ Your Door
 Baltimore Weeklies
 Cumberland Times-News
 Star-Democrat
 Cecil Whig
 The Herald-Mail Newspapers

Massachusetts

Boston
 Boston/Select
 Hyannis
 New Bedford
 Springfield
 Worcester

Boston Sunday Globe
 Savings Central
 Sunday Cape Cod Times
 Sunday Standard-Times
 Sunday Republican
 Sunday Telegram

Michigan

Adrian
 Ann Arbor
 Bad Axe
 Bay City
 Cadillac
 Dearborn
 Flint
 Gaylord

The Daily Telegram
 AnnArbor.com
 Huron Daily Tribune
 The Bay City Times
 News
 Press & Guide
 The Flint Journal
 Gaylord Herald-Times

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Parade Newspaper Listing
Newspaper by State

STATE**HOME CITY****NEWSPAPER NAME**

Grand Rapids	The Grand Rapids Press
Jackson	Citizen Patriot
Kalamazoo	Kalamazoo Gazette
Lapeer	The County Press
Marquette	The Mining Journal
Midland	The Midland Daily News
Monroe	The Monroe Sunday News
Mount Clemens	The Macomb Daily
Mount Pleasant	Morning Sun
Muskegon	The Muskegon Chronicle
Petoskey	Petoskey News-Review
Pontiac	The Oakland Press
Royal Oak	The Daily Tribune
Saginaw	The Saginaw News
Shelby Township	Advisor & Source Newspapers
Southgate	The News-Herald
Traverse City	Record-Eagle

Minnesota

Albert Lea	Albert Lea Tribune
Austin	Austin Daily Herald
Bemidji	The Bemidji Pioneer
Brainerd	Brainerd Dispatch
Duluth	Duluth News-Tribune
Faribault	Faribault Daily News
Grand Rapids	Grand Rapids Herald-Review
Hibbing	The Hibbing Daily Tribune
Mankato	The Free Press
Minneapolis-St. Paul	Star Tribune
Minneapolis-St. Paul/Select	Strib Express
New Ulm	The Journal
Northfield	Northfield News
Owatonna	Owatonna People's Press
Red Wing	Red Wing Republican Eagle
St. Paul	Pioneer Press
Virginia	Virginia Mesabi Daily News
Willmar	West Central Tribune
Winona	Winona Daily News
Worthington	Daily Globe

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Parade Newspaper Listing

Newspaper by State

<u>STATE</u>	<u>HOME CITY</u>	<u>NEWSPAPER NAME</u>
Mississippi	Brookhaven	The Daily Leader
	Clarksdale	The Clarksdale Press Register
	Columbus	The Commercial Dispatch
	Greenville	Delta Democrat Times
	Greenwood	The Greenwood Commonwealth
	Gulfport	Sun Herald
	Laurel	Laurel Leader-Call
	Mc Comb	Enterprise-Journal
	Meridian	The Meridian Star
	Picayune	Picayune Item
	Tupelo	Northeast Mississippi Daily Journal
	Vicksburg	The Vicksburg Post
Missouri	Cape Girardeau	Southeast Missourian
	Columbia	Missourian
	Dexter	The Daily Statesman
	Fulton	The Fulton Sun
	Jefferson City	News Tribune
	Joplin	The Joplin Globe
	Kansas City	The Kansas City Star
	Kansas City/Select	Yes! Your Essential Shopper
	Kennett	The Daily Dunklin Democrat
	Nevada	Weekend Herald-Tribune
	Park Hills	Daily Journal
	Poplar Bluff	Daily American Republic
	Sedalia	Democrat
	Sikeston	Standard Democrat
	St. Joseph	St. Joseph News-Press
	St. Louis	St. Louis Suburban Journal Sunday
	St. Louis	St.Louis Post-Dispatch
Montana	Billings	Billings Gazette
	Bozeman	Bozeman Daily Chronicle
	Butte	Montana Standard
	Helena	Helena Independent Record

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Parade Newspaper Listing
Newspaper by State

<u>STATE</u>	<u>HOME CITY</u>	<u>NEWSPAPER NAME</u>
	Kalispell	Daily Inter Lake
	Missoula	Missoulian
Nebraska		
	Beatrice	Sun
	Columbus	Telegram
	Grand Island	The Grand Island Independent
	Lincoln	JournalStar
	North Platte	The North Platte Telegraph
	Omaha	Sunday World-Herald
	Scottsbluff	Star-Herald
	York	York News Times
Nevada		
	Elko	Elko Daily Free Press
	Las Vegas	Las Vegas Review-Journal
	Sparks	Daily Sparks Tribune
New Hampshire		
	Keene	Sentinel
	Manchester	New Hampshire Sunday News
	Portsmouth	Seacoast Sunday
New Jersey		
	Atlantic City	The Press Of Atlantic City
	Flemington	Hunterdon Observer
	Hackensack	Suburban Trends
	Hackensack	The Bergen Record
	Jersey City	The Jersey Journal
	Newark	The Star-Ledger
	Newton	New Jersey Herald
	Trenton	The Times
	Trenton (Trentonian)	Trentonian
	Willingboro	Burlington County Times
	Woodbury	South Jersey Sunday
New Mexico		
	Albuquerque	Journal
	Clovis	Clovis News Journal

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Parade Newspaper Listing

Newspaper by State

STATE**HOME CITY****NEWSPAPER NAME**

Hobbs	News-Sun
Portales	Portales News-Tribune
Roswell	Daily Record
Santa Fe	The Santa Fe New Mexican

New York

Albany	Times Union
Auburn	The Citizen
Batavia	The Daily News
Buffalo	The Buffalo News
Canandaigua	Post Messenger
Canton	Advance-News
Catskill	Daily Mail
Corning	The Sunday Leader
Geneva	Finger Lakes Sunday Times
Glens Falls	Post-Star
Gloversville	The Leader-Herald
Hornell	The Spectator
Hudson	Register-Star
Kingston	Sunday Freeman
Malone	The Malone Telegram
Middletown	Times Herald-Record Sunday
New York	New York Post
Oneida	The Oneida Daily Dispatch
Oneonta	The Daily Star
Plattsburgh	Press-Republican
Saratoga Springs	Saratogian
Staten Island	Staten Island Sunday Advance
Staten Island/TMC	Staten Island Shore Editions
Syracuse	The Post-Standard
Troy	Record
Watertown	Daily Times

North Carolina

Albemarle	Albemarle Stanley News & Press
Burlington	Times-News
Chapel Hill	The Chapel Hill News
Charlotte	The Charlotte Observer
Durham	The Durham News

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Parade Newspaper Listing
Newspaper by State

STATE**HOME CITY****NEWSPAPER NAME**

Elizabeth City	The Daily Advance
Fayetteville	The Fayetteville Observer
Gastonia	Gaston Gazette
Goldsboro	Goldsboro News-Argus
Greensboro	The News & Record
Greensboro/Select	Sunday Plus
Greenville	The Daily Reflector
Hendersonville	Times-News
Jacksonville	News
Kinston	Free Press
New Bern	Sun-Journal
Raleigh	The News & Observer
Rocky Mount	Rocky Mount Telegram
Shelby	The Star
Southern Pines	The Pilot
Tarboro	The Tarboro Daily Southerner
Washington	Washington Daily News
Wilmington	Sunday Star-News
Winston-Salem	Winston-Salem Journal

North Dakota

Bismarck	Tribune
Dickinson	The Dickinson Press
Fargo	The Forum
Grand Forks	Grand Forks Herald
Jamestown	The Jamestown Sun
Minot	Minot Daily News

Ohio

Akron	Akron Beacon Journal
Ashland	Ashland Times-Gazette
Ashtabula	Astabula Star Beacon
Athens	Messenger
Cambridge	The Sunday Jeffersonian
Canton	The Repository
Circleville	Herald
Cleveland	The Plain Dealer
Cleveland/TMC	PD Wrap-Up
Columbus	Suburban News Publications

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Parade Newspaper Listing

Newspaper by State

<u>STATE</u>	<u>HOME CITY</u>	<u>NEWSPAPER NAME</u>
	Dayton	Cox Ohio Southwest Group
	Dayton	Dayton Daily News
	Defiance	The Crescent-News
	East Liverpool	Sunday Review
	Elyria	The Chronicle-Telegram
	Findlay	The Courier
	Fostoria	Review-Times
	Hamilton	Journal News
	Ironton	Ironton Tribune
	Lima	The Lima News
	Logan	News
	Lorain	Morning Journal
	Middletown	The Middletown Journal
	New Philadelphia/Dover	The Times Reporter
	Salem	Salem News
	Springfield	Springfield News-Sun
	Toledo	The Blade
	Waverly	The News Watchman
	Willoughby	Lake County News-Herald
	Wooster	The Daily Record
	Youngstown	The Vindicator
Oklahoma	Claremore	Claremore Daily Progress
	Mc Alester	McAlester News-Capitol
	Miami	Miami News-Record
	Muskogee	Muskogee Phoenix
	Oklahoma City	The Oklahoman
	Oklahoma City/TMC	Buyer's Edge
	Pryor	The Pryor Daily Times
	Tahlequah	Tahlequah Daily Press
	Tulsa	Tulsa World
	Woodward	Woodward News
Oregon	Albany/Corvallis	Albany Democrat-Herald/Corvallis Gazette-Times
	Bend	The Bulletin
	Coos Bay	The World
	Eugene	The Register-Guard

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Parade Newspaper Listing

Newspaper by State

<u>STATE</u>	<u>HOME CITY</u>	<u>NEWSPAPER NAME</u>
	Klamath Falls	Herald and News
	Medford	Mail Tribune
	Ontario	Argus Observer
	Pendleton	East Oregonian
	Portland	The Sunday Oregonian
	Portland Select	Community News
Pennsylvania		
	Allentown	The Morning Call
	Allentown/Select	MC Select
	Beaver	Beaver County Times
	Carlisle	The Sentinel
	Doylestown	The Intelligencer
	Du Bois	Tri-County Sunday
	Easton	The Express-Times
	Erie	Erie Times-News
	Gettysburg	Gettysburg Times
	Harrisburg	Sunday Patriot-News
	Harrisburg/Select	pn Community
	Hazleton	Hazleton Standard-Speaker
	Johnstown	The Tribune-Democrat
	Lancaster	Sunday News
	Levittown	Bucks County Courier Times
	New Castle	New Castle News
	Norristown	Times Herald
	Oil City/Franklin	The Derrick/The News-Herald
	Philadelphia	The Philadelphia Inquirer
	Philadelphia DN	Daily News
	Philadelphia/Spree	Savings Spree!
	Pittsburgh	Pittsburgh Post-Gazette
	Pottstown	Sunday Mercury
	Pottsville	Pottsville Republican Herald
	Primos	Delaware County Daily Times
	Reading	Reading Eagle
	Reading Select	Reading Eagle Direct
	Sayre	Morning Times
	Scranton	Scranton Times-Tribune
	Scranton Select	Scranton Times-Tribune Sunday Opt-In
	Shamokin-Pottsville	The Shamokin-Pottsville News-Item

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Parade Newspaper Listing
Newspaper by State

STATE**HOME CITY****NEWSPAPER NAME**

Sharon	The Herald
State College	Centre Daily Times
Stroudsburg	Pocono Record
Sunbury	The Daily Item
Towanda	Towanda Sunday Review
Uniontown	Herald-Standard
West Chester	Daily Local News
Wilkes-Barre	The Times Leader
Williamsport	Williamsport Sun-Gazette

Rhode Island

Providence	The Providence Sunday Journal
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South Carolina

Anderson	Anderson Independent-Mail
Charleston	The Post And Courier
Columbia	The State
Columbia/Select	Yes! Your Essential Shopper
Greenville	Greenville Journal
Greenwood	The Index-Journal
Hilton Head/Beaufort	The Island Packet/Gazette
Myrtle Beach	The Sun News
Myrtle Beach/Select	The Sun News Sunday Select
Orangeburg	The Times & Democrat
Rock Hill	The Herald
Spartanburg	Herald-Journal
Sumter	The Item

South Dakota

Aberdeen	American News
Belle Fourche	Butte County Post
Huron	Plainsman
Mitchell	The Daily Republic
Rapid City	Rapid City Journal
Watertown	Watertown Public Opinion

Tennessee

Chattanooga	Chattanooga Times Free Press
Crossville	Crossville Chronicle

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Parade Newspaper Listing
Newspaper by State

STATE**HOME CITY****NEWSPAPER NAME**

Dyersburg	The State Gazette
Johnson City	Johnson City Press
Knoxville	Knoxville News Sentinel
Knoxville/Select	Sunday Saver Select
Memphis	The Commercial Appeal
Morristown	Citizen Tribune
Murfreesboro	The Murfreesboro Post
Shelbyville	Shelbyville Times-Gazette
Tulahoma	The Sunday News

Texas

Abilene	Abilene Reporter-News
Amarillo	Amarillo Globe-News
Athens	Athens Daily Review
Austin	Austin American-Statesman
Beaumont	The Beaumont Enterprise
Brownsville	The Herald
Brownwood	Brownwood Bulletin
Corpus Christi	Corpus Christi Caller-Times
Corsicana	Corsicana Daily Sun
Dallas	The Dallas Morning News
Dallas/Al Dia	Al Dia
Dallas/Briefing	Briefing
Del Rio	Del Rio News-Herald
Denton	Denton Record-Chronicle
El Paso	El Diario de El Paso
Fort Worth	Star-Telegram
Fort Worth/Select	Yes! Your Essential Shopper
Gainesville	Gainesville Daily Register
Greenville	Greenville Herald Banner
Harlingen	Valley Morning Star
Houston	Houston Chronicle
Houston/SMC	The Good Life
Huntsville	The Huntsville Item
Jacksonville	Jacksonville Daily Progress
Kerrville	Kerrville Daily Times
Lubbock	Lubbock Avalanche-Journal
McAllen	Monitor
Midland	Reporter-Telegram

Exhibit E

Parade Newspaper Listing

Newspaper by State

<u>STATE</u>	<u>HOME CITY</u>	<u>NEWSPAPER NAME</u>
	Mineral Wells	The Mineral Wells Index
	Odessa	Odessa American
	Palestine	Palestine Herald-Press
	Paris	The Paris News
	Plainview	Plainview Daily Herald
	San Angelo	Standard-Times
	San Antonio	San Antonio Express-News
	Stephenville	Stephenville Empire-Tribune
	Temple	Temple Daily Telegram
	Texarkana	Gazette
	Tyler	Tyler Courier-Times-Telegraph
	Victoria	Victoria Advocate
	Waco	Waco Tribune-Herald
	Waxahachie	The Waxahachie Daily Light
	Weslaco	Mid Valley Town Crier
	Wichita Falls	Times Record News
Utah	Logan	The Herald Journal
	Provo	Daily Herald
	Salt Lake City	The Salt Lake Tribune-Deseret News
	Salt Lake City/Select	The Salt Lake Tribune Sunday Select
Vermont	Rutland/Barre	Rutland Herald/Barre Sunday Times Argus
Virginia	Martinsville	Martinsville Bulletin
	Newport News	Daily Press
	Norfolk	The Virginian-Pilot
	Norfolk/Select	Non-Subscriber Sunday Opt-In
	Petersburg	The Petersburg Progress-Index
	Richmond	Richmond Times-Dispatch
	Roanoke	The Roanoke Times
Washington	Bellingham	The Bellingham Herald
	Bremerton	Kitsap Sun
	Ellensburg	Daily Record

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Parade Newspaper Listing

Newspaper by State

STATE**HOME CITY****NEWSPAPER NAME**

Longview	The Daily News
Mount Vernon	Skagit Valley Herald
Olympia	The Olympian
Pasco-Kennewick-Richland	Tri-City Herald
Seattle	The Seattle Times
Seattle Select	Savings Source
Spokane	The Spokesman-Review
Tacoma	The News Tribune
Tacoma/Select	Yes! Your Essential Shopper
Vancouver	The Columbian
Walla Walla	Walla Walla Union-Bulletin
Wenatchee	The Wenatchee World
Yakima	Herald-Republic

West Virginia

Beckley	The Register-Herald
Bluefield	Bluefield Daily Telegraph
Charleston	Sunday Gazette-Mail
Clarksburg	Clarksburg Exponent-Telegram
Fairmont	Times West Virginian
Martinsburg	The Journal
Morgantown	The Dominion Post
Parkersburg	The Parkersburg News and Sentinel
Princeton	Princeton Times
Wheeling	Sunday News-Register

Wisconsin

Baraboo	Baraboo News Republic
Beaver Dam	Daily Citizen
Chippewa Falls	Chippewa Valley Newspapers
Eau Claire	Leader-Telegram
Kenosha	Kenosha News
La Crosse	La Crosse Tribune
Madison	Wisconsin State Journal
Portage	Daily Register
Racine	The Journal Times
Rhineland	The Daily News
Shawano	Shawano Leader

Exhibit E

Parade Newspaper Listing

Newspaper by State

STATE

HOME CITY

NEWSPAPER NAME

Wyoming

Casper

Casper Star-Tribune

EXHIBIT D

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

In re POLYURETHANE FOAM ANTITRUST
LITIGATION

This document relates to:

ALL INDIRECT PURCHASER CASES

)
)
)
) MDL Docket No. 2196

) Index No. 10-MD-2196 (JZ)

)
) **ORDER IN CONNECTION WITH**
) **CLASS NOTICE AND**
) **NOTICE OF SETTLEMENT**

This matter coming on to be heard upon the motion of Indirect Purchaser Plaintiffs (“IPP”) for approval of the forms of notice to be disseminated to the Class, the Notice Plan and to set dates in connection with the IPP and Domfoam and Valle settlement to which this Court granted preliminary approval by Order dated March 26, 2012 (Doc. # 355), upon consideration of the motion and accompanying memorandum,

IT IS ORDERED:

1. The Long Form and Short Form notices are approved and shall be disseminated to the members of the Class in substantially the same form as submitted and as soon as practicable.
2. IPPs’ Notice Plan for providing notice to the Class is approved.
3. In connection with the IPP and Domfoam/Valle settlement, the following dates shall apply:
 - a. Date to Object-August 15, 2014;
 - b. Date by which Requests for Exclusion are to be received-August 15, 2014;
 - c. Date of intention to appear at final approval to be received-August 15, 2014;
 - d. Final Approval Hearing-_____, 2014 at ____ (a.m. or p.m.)

Jack Zouhary
U. S. District Judge